

**ROYAL COMMISSION INTO INSTITUTIONAL
RESPONSES TO CHILD SEXUAL ABUSE**

**Public Hearing - Case Study 29
(Day 150)**

Level 17, Governor Macquarie Tower
Farrer Place, Sydney

On Friday, 31 July 2015 at 10am

Before
The Chair: Justice Peter McClellan AM
Commissioner: Professor Helen Milroy

Counsel Assisting: Mr Angus Stewart SC

1 MR STEWART: Your Honour, the next witness, Dr Monica
2 Applewhite, is an expert witness who has been engaged by
3 the Watchtower Bible & Tract Society of Australia as an
4 expert witness, and offered for testimony to the
5 Royal Commission. I call Dr Applewhite.

6
7 <MONICA LISA APPLEWHITE, sworn: [10.05am]

8
9 <EXAMINATION BY MR STEWART:

10
11 MR STEWART: Q. Dr Applewhite, I will start with a
12 little bit of background. You are from the United
13 States --

14
15 THE CHAIR: I think we need the witness's name.

16
17 MR STEWART: Q. Your full name, Dr Applewhite?
18 A. Monica Lisa Applewhite.

19
20 Q. You have furnished a report to the Royal Commission;
21 is that right, dated 22 July 2015?

22 A. That's correct.

23
24 Q. And two annexures to that report - one is your letter
25 of instructions from Milton Bray and the other is
26 a curriculum vitae for yourself; is that right?

27 A. That's correct.

28
29 Q. Do you confirm that the report is true and correct?

30 A. Yes.

31
32 MR STEWART: I tender the report, your Honour.

33
34 **EXHIBIT #29-0013 REPORT OF DR APPLEWHITE**

35
36 MR STEWART: Q. You are from the United States of
37 America; is that right, Dr Applewhite?

38 A. That's correct.

39
40 Q. You have been engaged by the Watchtower Bible & Tract
41 Society of Australia as an expert witness for the purpose
42 of this hearing; is that right?

43 A. That's correct.

44
45 Q. Your ordinary work is as a consultant broadly in the
46 area of child sexual abuse; is that right?

47 A. I have worked in other fields beyond sexual abuse,

1 I've also worked with physical abuse and neglect, but the
2 majority of my work has been with sexual abuse in
3 organisations.
4
5 Q. And not limited to children?
6 A. No, also vulnerable adults as well.
7
8 Q. Just by way of background, your primary and secondary
9 education - in other words, your school education - what
10 nature of institutions were you at school?
11 A. Sorry, did you say my primary and secondary?
12
13 Q. Yes.
14 A. I was --
15
16 Q. In other words, were they faith-based school education
17 that you attended?
18 A. No, I attended - we would call public school, you
19 would call State school, I think.
20
21 Q. Yes. And you are an active Catholic; is that right?
22 A. I am.
23
24 Q. Insofar as your tertiary education is concerned, you
25 have a Bachelor of Science in social work from the Texas
26 Christian University, Fort Worth, Texas, in 1990; is that
27 right?
28 A. That's right.
29
30 Q. That university, Texas Christian University, is that
31 particular to any particular denomination within the
32 Christian religion more broadly?
33 A. It is. It is affiliated with the Disciples of Christ.
34
35 Q. The Disciples of Christ?
36 A. Yes.
37
38 Q. Then you have a Masters of Science in social work from
39 the University of Texas at Arlington, 1992; is that right?
40 A. That's right.
41
42 Q. And a PhD in social work, also University of Texas at
43 Arlington, 1995; is that right?
44 A. That's correct.
45
46 Q. In your CV, that is described as "clinical track", can
47 you explain what that means?

1 A. Sure. When you work on your PhD in that particular
2 program, you have two options, and one is a clinical track,
3 which would focus more on therapeutic types of work and the
4 other is an administrative track that would focus on being
5 responsible for non-profit organisations that would provide
6 social service to groups of people.
7
8 Q. Is that a PhD by dissertation alone or part
9 dissertation and part course work?
10 A. There are - course work and then you do a dissertation
11 at the end.
12
13 Q. Proportionately, how, insofar as qualifying for the
14 PhD, how much is allocated to the dissertation as opposed
15 to the course work?
16 A. It depends on the person, how long it takes them to
17 get their dissertation completed, but roughly speaking I'd
18 say two-thirds course third, one-third dissertation.
19
20 Q. The dissertation, how long is it?
21 A. How long is it?
22
23 Q. Yes, in words?
24 A. Oh, I have no idea.
25
26 Q. Your PhD, they didn't specify it has to be --
27 A. A certain number of words?
28
29 Q. Yes.
30 A. Not that I recall.
31
32 Q. Thank you. Your PhD dissertation is entitled
33 "A logical regression model on the decision-making process
34 of women in abusive relationships"; is that right?
35 A. That's correct.
36
37 Q. That is, I would understand from the title, not to do
38 with or relevant to child sexual abuse particularly?
39 A. Not particularly. It was women who were in abusive
40 relationships making decisions whether to stay or to leave
41 an abusive partner.
42
43 Q. Did you publish your dissertation?
44 A. I did not.
45
46 Q. Have you published any peer-reviewed publications?
47 A. I have not.

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Q. In your CV you mention a couple of publications that you do have, and that is on page 7 of the CV. That is at Ringtail 23.

A. Yes.

Q. You have only listed two there. I understand there are others; is that right?

A. Things that I've written have been published in online educational programs. I have a couple of chapters now that have been published, but none of those are peer-reviewed articles, if that's the question.

Q. The first one you have there, "Putting abuse in context", America Magazine, September 2006 - America Magazine is a magazine published by the Order of Jesuits; is that right?

A. Yes, it's a Jesuit publication.

Q. The second publication you have there, "Human Development Magazine", is a Catholic magazine; is that right, or journal?

A. Yes, it is a Catholic magazine.

Q. You are on the board of that, the editorial board of that journal?

A. Yes.

Q. Insofar as your work history and experience is concerned, I understand from your CV that you were first employed in 1992 in a consulting firm; is that right?

A. That's correct.

Q. You worked with that firm until 2007?

A. That's correct.

Q. Thereafter, you have worked as an independent consultant in essentially your own consultancy; is that right?

A. That's correct.

Q. If I have it correctly, you have not worked in a service delivery organisation per se, have you?

A. I have worked in service delivery organisations while I was still working on my PhD, or working on my masters degree, or working on my bachelor's degree, throughout the time I was in school I had to work.

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Q. Let's leave school aside. In the time period of your postgraduate education, what were the nature of the service delivery organisations you worked in?

A. They were residential treatment programs for children; day treatment programs for children, mostly for children who had experienced emotional, physical, sexual abuse and had emotional and behavioural problems as a result.

Q. And the nature of your work in those institutions?

A. I did social work, I did social intake work, I facilitated groups.

Q. Was some of that part of your training as a social worker?

A. Yes.

Q. In other words, linked to your academic work?

A. Some was part - I worked in practicums while I was in school, and I also worked to work to pay for school.

Q. One of the things that is important in this area of, broadly speaking, child safety or the prevention of child sexual abuse in organisations is the question of standards. Have you ever developed such standards - in other words, standards of practice for the reporting or prevention of child sexual abuse in religious organisations?

A. Could I just clarify the language - standards of practice? I have worked to figure out and determine what were the standards of care in a particular time frame, and when I say "standard of care", I mean what would be a reasonable expectation of an organisation in a particular time frame, given the information that was available, the professional research, the guidelines that were available, the criminal justice systems. So that would be a standard of care. And then there is also best practice, which is recommendations that I would make, that I would advocate that a better way of doing things would be this type of a practice, and so I don't usually use the word "standard of practice", I would say standard of care and best practice.

Q. So insofar as standard of care is concerned, what you have indicated, if I understand you correctly, is you have looked back historically and identified what seemed to you to be the standards that were applicable at a particular time; is that right?

1 A. Yes.

2

3 Q. And insofar as best practice is concerned, that would
4 be looking at any current point in time as to what you
5 would regard to be best organisational practice; is that
6 right?

7 A. Yes.

8

9 Q. Insofar as developing best practice is concerned, can
10 you identify in your CV where you have outlined a lot of
11 the work that you have done in different organisations,
12 which of those has involved that? In other words, which of
13 that work has involved developing best practice or advising
14 on best practice?

15 A. Sure. So even beginning back at the beginning of the
16 work in 1992, the purpose - so from 1992 until today, the
17 purpose of the educational programs that I provide and the
18 consulting that I provide is to work with an individual
19 organisation to help them figure out how to better prevent
20 and respond properly to incidents of abuse. So that would
21 be from the very beginning. Now, what we knew and
22 understood when I started is different than what we know
23 now, but that's always been the purpose, has been to push
24 the organisation along to try to figure out how do you
25 prevent, how do you respond if someone comes and says that
26 they have had an experience of abuse. That's always been
27 the purpose.

28

29 Q. So if I'm to understand you correctly, essentially,
30 throughout your consulting career at any particular point
31 in time, you have consulted to organisations where, at that
32 point in time, you have engaged with them as to what best
33 practice is or should be for their organisation; is that
34 right?

35 A. It is, and if I could just clarify, where that
36 information first came from. Before I started consulting,
37 I worked conducting root cause analysis of cases and
38 analysing cases in organisations to figure out at what
39 point did - at what point could this have been prevented;
40 at what point could this have been responded to more
41 quickly; were there warning signs? And, if there were, and
42 typically you can find something that could be fixed, then
43 to figure out how that could be implemented as a prevention
44 process in an organisation. So once you put together 200
45 or 300 or 400 cases, you begin to see the patterns, I'm
46 sure that you would see the patterns now, and when you
47 follow along those patterns and you can figure out where is

1 the piece that can be fixed in, for example, screening and
2 selection or in supervision or in opportunities for people
3 to come forward. So that's always been the purpose. And
4 I started consulting after conducting research.

5

6 Q. That research - in what way were those cases, the
7 hundreds you have spoken of, cases presented to you and how
8 did you get access to them?

9 A. Originally there weren't hundreds and hundreds. The
10 way that we started was working with organisations that
11 already - we had a group of consultants and already had
12 contacts with organisations and asked them to help us
13 identify cases that we could analyse. There were also some
14 publicised cases that had been publicised through the legal
15 system, and so you could use those cases. And as, we began
16 consulting and as I began doing the work, we could add the
17 cases - in the early days, when someone would call and say
18 we want to figure out a prevention plan in 1993 or 1994,
19 almost invariably there had been some cases in their
20 organisation, and so we would accumulate those cases that
21 way.

22

23 Q. I take it you learnt a lot from the analysis of those
24 cases?

25 A. I did learn a lot from the analysis of those cases.

26

27 Q. You didn't publish the outcomes of that analysis, as
28 I understand it?

29 A. We did not.

30

31 Q. Is there a reason for that? I would have thought that
32 others might have found your work in that area valuable,
33 had it been published?

34 A. That's true. The trouble was that the way that the
35 cases were identified and the way that they could be
36 analysed was not up to the rigours of empirical research in
37 that way. When you begin to say - when you begin to make
38 generalisations and publish an article that says "This is
39 everything that we have found", you can have anecdotal
40 evidence and say "This is what we have found in this case,
41 this is what we have found in that case", but often times
42 the amount of information you have about a particular case
43 will vary from organisation to organisation - when you came
44 along, were you able to do interviews and there was so much
45 in research methodology that didn't bring it up to the
46 standards to be published in a way.

47

1 Q. In the period post 2007 - in other words, when you had
2 your own consultancy - with reference to the particular
3 work identified in your CV, can you identify for us which
4 of those items of work or engagements involved the review
5 or presentation of best practice in the organisation?

6 A. From 2007 to the present?

7

8 Q. Yes. So, in other words, I'm looking at page 2 of
9 your CV, Ringtail 18.

10 A. Yes. And your specific question is what involved the
11 review and development?

12

13 Q. Yes, the review of or development of best practice in
14 the organisation?

15 A. The review - the risk assessment in Milton Hershey
16 School. It is a little bit difficult for me to talk about
17 that, because so much of what I have to do isn't on behalf
18 of a specific organisation. So, in order to continuously
19 know what is best practice, you have to continuously read
20 the empirical research, you have to continuously apply
21 findings from various organisations. So it's - in some
22 ways, it's all tied in. But I think what you are asking me
23 is when was I reviewing their practices to give them
24 feedback.

25

26 Q. To use your terminology, let me rephrase it -
27 reviewing their particular standards of care and advising
28 on their best practice - in other words, what their best or
29 better practice should be.

30 A. Okay. So the way that I would do that normally - for
31 example, the risk assessment at Milton Hershey School,
32 that's a school that provides education for impoverished
33 children, so what I would do - what I did - is look at
34 everything that they are doing, in terms of their
35 practices, how do they screen, how do they supervise, and
36 then compare those with what would be the standard of care
37 or what would be expected in an industry that is similar to
38 theirs. And then, if there is anything from a risk
39 management perspective, that could be helpful to bring them
40 to an even better practice, then I would make that
41 recommendation.

42

43 Q. Just before you go on and identify the next one, and
44 so on, because I'm going to ask you to identify each one,
45 but you mention there the standards of care in the
46 industry. What do you have reference to to identify what
47 is the standard of care?

1 A. So it depends on the industry. In a place where there
2 is accreditation standards, those would clearly be the
3 standards of care. Many of the organisations I work with
4 don't have accreditation or don't have a particular set of
5 standards that have been imposed; they have to figure those
6 out. So the other places that I would look would be the
7 guidelines that have been given through a governmental
8 entity, the publications that are available for those types
9 of organisations, what similar organisations are doing. If
10 it's been found, for example, the education - the
11 Department of Education has published a study, perhaps, on
12 peer-to-peer, student-to-student abuse and they have
13 recommendations - so any of those would be reference points
14 for the particular type of organisation.

15
16 THE CHAIR: Q. Can I just understand something. Your CV
17 includes a list of the organisations which you refer to as
18 "Specific client organisations"?

19 A. Yes.

20
21 Q. Just taking the religious organisations, I haven't
22 counted them up - there is a lot of them.

23 A. There is a lot. I have worked a great deal with
24 religious organisations.

25
26 Q. Are you telling us that you have gone in and done
27 separate work with each of these separate religious
28 organisations?

29 A. Yes.

30
31 Q. Truly? How many are there?

32 A. Well, one of the reasons that there are so many is
33 that when - in the United States when the Catholic Church
34 developed programs for the dioceses under the Charter For
35 Protection of Children and Young People, the Conference of
36 Major Superiors of Men also developed a program and
37 I oversaw the implementation of that program and during
38 that time worked with many, many individual religious
39 orders and congregations of men.

40
41 Q. So when you say you oversaw the program, a program was
42 developed and then you participated in its implementation;
43 is that what you are saying?

44 A. I worked to - I worked with them to develop the
45 program of accreditation, and then --

46
47 Q. Who did you work with for that?

1 A. The Conference of Major Superiors of Men.
2
3 Q. So that is an overarching body?
4 A. It is. And we had a specific - we had a specific
5 advisory body of individual leaders from within that to
6 develop standards, and then I went to regional meetings
7 with the leadership of those orders and congregations, with
8 the standards --
9
10 Q. So you have been to meetings of each of
11 these organisation?
12 A. The ones that I have listed are the ones that I've
13 actually been to - either went to their - where they live
14 to do an accreditation audit or I went and did an
15 educational program with them, or I did a risk assessment
16 with them or developed policies with them. So each one of
17 those would be an individual meeting most of the time, at
18 the place where they function.
19
20 Q. Individual meeting or series of meetings or what?
21 A. Sometimes for weeks. Sometimes for months.
22
23 Q. You must have been very busy.
24 A. You can see why I decided I was travelling too much
25 and had to make some changes.
26
27 Q. What about all of the other organisations - are you
28 saying to us that you have been one-on-one with each of the
29 other organisations as well?
30 A. Yes.
31
32 Q. Sorry?
33 A. Yes, sir, I am.
34
35 Q. To do what?
36 A. It depends. Sometimes, a risk assessment; sometimes
37 an educational program, sometimes policy development.
38
39 Q. Do you have assistance?
40 A. Much of this work took place before 2007. I still do
41 a great deal of work now. I had a team, when I was working
42 with Praesidium.
43
44 Q. You had a team of people working with you?
45 A. Yes.
46
47 Q. So when was that? That was up until --

1 A. Up until 2007.
2
3 Q. So can we assume that all of the work that was done up
4 until 2007 has been done by you with others; is that right?
5 A. Up until 2007?
6
7 Q. Yes.
8 A. Yes.
9
10 Q. And that, when I look at these organisations, seems to
11 be all of it; is that right?
12 A. Up to 2007? No.
13
14 Q. Which ones are after 2007?
15 A. Are we working - are we looking at religious or are we
16 looking at just throughout?
17
18 Q. Well, I was looking at organisations under the heading
19 "Specific client organisations", then trying to relate that
20 back, but have I missed something?
21
22 MR STEWART: Q. To help you, Dr Applewhite, would it be
23 those that are listed from the middle of page 2 through to
24 the foot of page 3 - that page and a half?
25 A. Sure.
26
27 Q. In the post-2007 period?
28 A. Yes.
29
30 THE CHAIR: Q. I was just trying to relate - you have
31 identified particular organisations, September 2007, and
32 then "Research" you have also identified. Then we go,
33 I think, to everything that has been done before 2007. And
34 then I was trying to relate that back to the particular
35 organisations you mentioned.
36 A. Mmm-hmm.
37
38 Q. My guess was that they were all before 2007.
39 A. So I can - the work that I've done since 2007 has
40 focused on independent schools, private schools - so they
41 would be, if you look under "Schools", Buckingham Brown &
42 Nichols School.
43
44 MR STEWART: Q. You are looking at page 11?
45 A. Yes.
46
47 Q. Hackley School, Marlborough School For Girls, Milton

1 Hershey School.

2

3 THE CHAIR: Q. So the schools might be after 2007?

4 A. Yes.

5

6 Q. And then I have also focused on a couple of
7 international projects that - in the Catholic church, the
8 in Missionaries of the Sacred Heart, Holy Cross Fathers and
9 Brothers, and the Monfort Missionaries.

10

11 Q. What have you done for them?

12 A. I have worked with those to develop standards that
13 could be applied to their organisations, so there would be
14 congregations of men that would have men in anywhere from
15 20 to 40 countries. So I've worked with them to develop
16 standards that could be applied to their organisation
17 throughout the world.

18

19 Q. What do you mean "standards"?

20 A. Standards - so, for example, that - just a standard
21 that I would use as an example would be that anyone who has
22 ever had a sexual offence against a minor would never be in
23 public ministry again, and that would be a standard that
24 I would work with them to educate people about, to try to
25 make sure that each part of the world where they are
26 working would uphold that standard. So we would develop
27 the standards and then do education about it and work with
28 them to figure out what the policy differences might be,
29 because the law is so different in so many different
30 places, and then go to those countries, if we need to, and
31 make sure that they are being implemented.

32

33 MR STEWART: Q. Dr Applewhite, if you go back to page 2
34 of your CV, you had identified the Milton Hershey School,
35 that is a second, as it were, sub-bullet point, as being
36 work that you did which included the identification of
37 their standard of care and advising on best practice. Do
38 you recall when that was; Milton Hershey School?

39 A. I have worked with Milton Hershey School off and on
40 since 2007, so when I did that actual risk assessment,
41 I did a risk assessment and then I did a review later to
42 see if they had implemented the recommendations. So
43 probably I did the review maybe a year ago, and the
44 original risk assessment maybe two years ago. It could
45 have been a little longer, but about that.

46

47 Q. And then which of these others here involved the

1 identification of their standards and advice on best
2 practice?
3 A. I don't see any more that specifically had that as the
4 function of the work. Conducting a risk assessment is one
5 of those types of tasks that takes quite a bit of time, and
6 so that's something that, if I'm asked to do that, I often
7 refer that to my former company and say "Maybe need a team
8 to do that".
9
10 Q. If we take a look at page 10 of your CV, you do list
11 a number of institutions in Australia?
12 A. Mmm-hmm.
13
14 Q. Three-quarters of the way down we see Roman Catholic
15 Archdiocese of Melbourne, Victoria, and there are some
16 others. But starting first with Melbourne, can you explain
17 what work you did for that archdiocese and when it was?
18 A. Melbourne, in particular, I have not worked closely
19 with. They asked me to do a video - an educational video,
20 where they had someone come in and ask certain questions,
21 they came to Austin, where I live, and I answered those
22 questions, and I don't know if they've actually ever used
23 that or not. So that would be one that I have not worked
24 very closely with.
25
26 Q. And when was that?
27 A. That was maybe a year and a half ago.
28
29 Q. A couple further down it says Roman Catholic
30 Archdiocese of Sydney.
31 A. Yes. I've done work with the Catholic Education
32 Office in Sydney and --
33
34 Q. You list that separately on the bottom of the next
35 page. Perhaps we can deal with the Catholic Education
36 Office separately, but insofar specifically as the
37 Archdiocese of Sydney is concerned, what work did you do
38 with them and when?
39 A. I don't - I think that I must have done - I must have
40 listed that incorrectly, because the work - I've done
41 several different educational programs for the Catholic
42 Education Office, but not the archdiocese separately from
43 them.
44
45 Q. Can you tell us what work you did for the Catholic
46 Education Office?
47 A. Sure. I have conducted educational programs on

1 general prevention awareness of the dynamics of
2 relationship-based abuse; types of people who offend, who
3 sexually abuse, in faith-based organisations; and warning
4 signs that we would see in faith-based organisations and
5 how to act on those warning signs, in terms of prevention.
6 I've also done a program on pastoral response to people who
7 come forward.

8
9 Q. And by "done a program", do you mean you came here and
10 ran a program with people from that institution?

11 A. I have actually conducted programs for them in two
12 separate ways, and that would actually be - other Catholic
13 dioceses from throughout New South Wales were invited to
14 come to or plug in to video conference training that
15 I conducted, and that - and then I also came here and
16 conducted programs.

17
18 Q. And the programs you came here and conducted --

19 A. Yes.

20
21 Q. -- when were those?

22 A. I think that the last one I did was three years ago.

23
24 THE CHAIR: Q. Is this with teachers or priests or --

25 A. I haven't done a program for priests in the
26 Archdiocese of Sydney. Some priests may have come, but it
27 would have been for principals and leadership within
28 Catholic education.

29
30 Q. So lay people?

31 A. They would be lay people, unless there is a principal
32 that happens to be a religious.

33
34 MR STEWART: Q. And the Catholic Diocese of Adelaide?

35 A. Yes.

36
37 Q. What work did you do for them?

38 A. Similar types of programs where we - I usually try to
39 start with the basics of the dynamics of how abuse happens,
40 the experiences that people who are abused describe, and
41 then go into what leadership can do when they learn of
42 warning signs, how they can make it easier for people to
43 come forward.

44
45 Q. Was that by video conferencing or did you come and do
46 programs in Adelaide?

47 A. I did programs in Adelaide.

1
2 Q. When was that?
3 A. Maybe the first one was in 2010 - 2010/2011. The
4 other - yes.
5
6 Q. And then you have got the Catholic Diocese of Cairns.
7 A. Yes.
8
9 Q. What did you do with them? Obviously, if it is the
10 same as you did with Adelaide, you can say it is the same,
11 and it will cut it short.
12 A. It is the same that I did with Adelaide, but -
13 I believe that I conducted more in-depth seminars in
14 Adelaide and have only done basic programs, so far, in
15 Cairns.
16
17 Q. Over the page, about 8 or 10 dot points down, we have
18 the Roman Catholic Diocese of Toowoomba, in Queensland.
19 A. Yes. That's actually another one where I should be
20 specific. That's with the Catholic Education Office in
21 Toowoomba.
22
23 Q. What did you do with them?
24 A. I did a seminar - a full-day seminar that they
25 videotaped, where we went from the basics all the way
26 through to what leadership can do to prevent in the future,
27 as well as what ordinary people who are receiving services
28 in the organisation, which in this case would be the
29 parents and students, need to know; and they used those
30 videotapes to also conduct educational programs for new
31 staff that are coming in now.
32
33 Q. I missed one on the previous page - Roman Catholic
34 Archdiocese of Brisbane. You have done a couple of
35 educational programs for that archdiocese, have you not?
36 A. I have. I've been - I went there this - on this trip,
37 and I also have been there previously, two years ago.
38
39 Q. If I understand it correctly, the work you have done
40 in Australia has, for the most part, been educational -
41 educational programs of one form or another; is that right?
42 A. That's correct.
43
44 Q. Has that really become more the focus of your work
45 since you have been in your own consultancy - educational
46 programs, that is?
47 A. I do more educational programs now because of the time

1 that it takes to do risk assessments and the amount of time
2 being away from home that it takes to do risk assessments,
3 especially if you are just one person. So I do more
4 educational programs, but I also do individual consultancy,
5 so that if somebody's dealing with a particular situation,
6 for example, somebody has boundary violations and it is not
7 a criminal behaviour but they are worried about them, then
8 they can get advice and I can review it and walk them
9 through the steps.

10
11 Q. To use your terminology, the standards of care that
12 apply at any particular time are changing, aren't they - in
13 other words, this is quite a fast-moving area insofar as
14 standards are concerned; is that right?

15 A. Yes, I've seen tremendous change since I began the
16 work.

17
18 Q. So if one was to talk about current standards, one
19 would be talking what sort of time frame - the last two,
20 three years, five years? What would "current standards"
21 be?

22 A. I really put the current standards in a time frame
23 from about 2000 to today. Even though things are changing
24 rapidly, I would call the current era a different time
25 frame from 2000 to today.

26
27 I think after two or three more years go by, we're
28 going to be able to separate out 2010 from the others,
29 because things are beginning to formulate and become more
30 clear, seeing more consistency, but I'm sure we have a long
31 way to go.

32
33 Q. Returning to your report itself and paragraph 4 in
34 particular --

35
36 THE CHAIR: Q. Can I just pause for a moment. You
37 speak about current standards or standards, what are you
38 talking about?

39 A. When I'm speaking about current standards or
40 standards, I'm really saying given everything that we know
41 today, what are the reasonable expectations for an
42 organisation today, and in a sense, if they are not holding
43 up to those standards that we could expect from everybody,
44 given everything that we know now, what would be falling
45 short of expectations, reasonable expectations by society.

46
47 Q. But in relation to what?

1 A. In relation to how they prevent abuse, particularly in
2 sexual abuse; how they prevent sexual abuse; how they
3 respond to warning signs; how they respond if somebody
4 actually discloses abuse; how do they - do they fix things
5 afterwards? How do they follow up? I mean, the prevention
6 piece of it, in itself, is where I'm focusing attention now
7 in my educational programs, because I feel like we're past
8 the point of just responding properly, that we really
9 should be using what we know to prevent it from happening
10 in the first place. So that's what I mean.

11
12 MR STEWART: Q. Just to develop that a little bit
13 further, insofar, then, as current standards or current
14 expectations of standards are concerned, let's deal perhaps
15 slightly more narrowly with the question of raising and
16 responding to child sexual abuse allegations or complaints
17 or concerns within an organisation. Would one of those
18 standards or requirements be what I might describe as child
19 centred?

20 A. That how we respond should be child centred?

21
22 Q. Yes.

23 A. Or - I would probably make it a bit more broadly, that
24 the individual - because a lot of people who come forward,
25 at least in a faith-based organisation, come forward later,
26 and so I would hope that even if they weren't a child any
27 more, that we could have a victim or survivor-centred
28 response.

29
30 Q. Yes. I take that point. Thank you. In other words,
31 would that be the best interests of the child or adult
32 survivor is foremost in the way in which we respond?

33 A. Yes.

34
35 THE CHAIR: Q. Does that mean that the process should be
36 one which is designed to ensure that the child or adult
37 survivor feels able to come forward and comfortable in
38 reporting what has happened?

39 A. Absolutely.

40
41 Q. Is that a critical thing to an effective response from
42 an institution?

43 A. Not in my opinion.

44
45 Q. Sorry?

46 A. You are saying is it critical - you are saying is it
47 important?

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Q. Yes.

A. Oh, absolutely.

Q. Is it one of the primary factors, as it were, that must be found in any system of response?

A. For a faith-based organisation, I think how the person feels about being able to come forward and how they are treated once they are coming forward is absolutely essential.

Q. Why just faith-based, why isn't that true of any organisation?

A. The difficulty is - because I work with so many organisations that - I work with so many organisations that don't have the resources to have that set up for themselves - social service organisations that are going to need to use an outside entity to be able to come forward. They might not be fully equipped to have a program for someone to come into or to be prepared for that to come forward to them.

Q. Even then, shouldn't they have in place a process, even if it involves engaging an outside organisation?

A. Absolutely.

Q. Shouldn't they have in place a process which allows a child or an adult survivor the capacity to come and feel safe in reporting?

A. Yes, definitely.

MR STEWART: Q. And that is partly about being child-centred, about making the child or the survivor feel safe and secure, but it's also to do, I suppose, with achieving an environment where full disclosure is possible or more likely?

A. You are asking if part of the way you create a victim- or survivor-centred response system is to create an environment where people feel comfortable to disclose? Is that right?

Q. I'm saying they are two reasons why one may - perhaps there are many others - at least two reasons why it is important to create that environment. One would be for the health and wellbeing of the survivor, but another, and related one, is that in that environment, they are more likely to be able to disclose what actually happened so

1 that the organisation can properly deal with it; would that
2 be right?

3 A. Yes. We could probably come up with other reasons as
4 well.

5

6 Q. Would another aspect of best practice be an ability by
7 the organisation to take effective child-safe action once
8 a report has been made and upheld?

9 A. It really depends on the organisation. For example,
10 a school may not be able to take child-safe action
11 themselves; they have to rely on child welfare entities to
12 assist them with that.

13

14 Q. So would it be right, then, either an ability
15 themselves to take child-safe action, or a relationship
16 with other authorities that have that ability?

17 A. Yes. The question of how is the child going to be
18 safe is a question that must be answered.

19

20 Q. And that would depend on the facts justifying it - in
21 other words, if there were - on the information available,
22 the reasonable conclusion was that abuse had taken place,
23 then the organisation should have the ability to act on it;
24 is that right?

25 A. I don't think that's what I'm saying, merely because
26 many times when it's time for an organisation to make
27 a report to the child welfare authorities, the facts of the
28 matter have not yet been established.

29

30 Q. That is an important qualification so far as reporting
31 is concerned, I see that. Insofar as the organisation
32 taking its own action, child-safe action internally is
33 concerned, that ability would be required once sufficient
34 facts are available to determine that there has been abuse;
35 would that be right?

36 A. I'm just sort of getting hung up on whose
37 responsibility it is to take child-safe action, because
38 that really varies from the situation - who the perpetrator
39 is, who the child is. So, for example, if we're talking
40 about a resident camp and a child reports abuse out at an
41 overnight camp, and the allegation is that the person who
42 is working at the camp has abused, then being able to
43 separate that child from the person who abused them is -
44 absolutely has to be part of the response. You don't want
45 to give the person further access to that child and that's
46 an action that the organisation can take.

47

1 But sometimes, for example, in a school, they make
2 a report, but the child is still going home that day and
3 the report was about a person who abused them at home, and
4 so it's not - unless the police say "Don't send that child
5 home", or the child welfare entity says, "Don't send that
6 child home", then the school can't just say "We're taking
7 the child home with us, we're not going to let them go back
8 to the house". That just can't be done.

9
10 THE CHAIR: Q. But the starting point is either the
11 school or the camp or any other institution has to have,
12 within its own operation, a process which makes it possible
13 for the child or adult survivor to come and tell what
14 happened, isn't it? That's the starting point?

15 A. Yes. That's - I think that's --

16
17 Q. And great care has to be taken by the institution to
18 ensure that what it has in place, so far as it can, will
19 ensure that the child or adult survivor will come and tell
20 their story?

21 A. I think when we were talking about, you know, what do
22 we consider part of this current era, I think that's one of
23 the most critical pieces of the current era.

24
25 Q. And if an institution doesn't have that, it is
26 seriously failing in its obligation to those within its
27 care? Isn't it?

28 A. If there is not a way for someone to come forward?

29
30 Q. If there is not a safe way where people, children or
31 adults, feel that they can come forward and report the
32 abuse, then the institution is failing.

33 A. They wouldn't be meeting the current standards of
34 care.

35
36 THE CHAIR: No.

37
38 MR STEWART: Q. I take from what you say, too, that
39 there should be strong and cooperative relationships with
40 child protection authorities. In other words, between the
41 organisation and child protection authorities and, indeed,
42 criminal justice authorities; would that be right?

43 A. Certainly in a country like this. Not in every
44 country is it easy to have strong relationships with the
45 criminal justice system, but in a country like this,
46 certainly.

47

1 Q. In the case of the identification of an offender, to
2 have a proper risk assessment to inform what is then to be
3 done - that would be another important component, wouldn't
4 it?
5 A. Well, are you talking about on the part of the
6 organisation?
7
8 Q. Yes, and an offender within the organisation. So the
9 example you gave of someone teaching at camp or a teacher
10 or a minister in a church.
11 A. There are scenarios where having a risk assessment is
12 critical, but from my perspective, we don't - if a teacher
13 or a minister or someone has behaved improperly, crossed
14 the line with repeated boundary violations and/or there has
15 been a disclosure of abuse, then that individual continuing
16 to be in a position of trust with children is not
17 acceptable, and whether there is a risk assessment or not -
18 I wouldn't want to have to wait for a risk assessment if we
19 know what the behaviour is.
20
21 Q. I understand from your CV that you have given evidence
22 as an expert witness for the Jehovah's Witnesses on
23 previous occasions; is that right?
24 A. Yes.
25
26 Q. Three in the US and one in the UK?
27 A. That's correct.
28
29 Q. In each of those cases, was the Jehovah's Witness
30 organisation in one form or another a defendant?
31 A. Yes.
32
33 Q. And those were civil claims for damages arising from
34 abuse; is that right?
35 A. That's correct.
36
37 Q. Each of them?
38 A. I believe so, yes.
39
40 Q. I take it you were paid for your services?
41 A. Yes.
42
43 Q. As you are today?
44 A. That's correct.
45
46 Q. At your usual consultancy rates?
47 A. Yes.

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Q. Following any of those cases, have you advised or made recommendations to the Jehovah's Witness organisation, in whatever formation, as to ways in which it can or should change or adapt to better meet best practice?

A. What I've done is ask the questions along the way as to particular things that I saw in the case and asked whether or not those had changed, if the scenario had changed; had they already changed their practices in particular areas, and I can't think of a time when I asked anything that they hadn't already resolved. So each of those cases was going back in time, and so they have had quite a few changes to their practices over the past 10 years.

THE CHAIR: Q. Have you ever given evidence that is critical of the Jehovah's Witnesses?

A. In terms of a lawsuit or --

Q. In any forum where you have given evidence, have you given evidence critical of the Jehovah's Witnesses?

A. I haven't in a particular - I haven't been hired to do that. I'm sure that when I was testifying or something I wrote, I may have said something that was critical or negative.

Q. When you say you haven't been hired to do that, what have you been hired to do?

A. Well, what I was originally hired to do by the Jehovah's Witnesses was just review their literature and asked - they asked me to give my opinion of what it was that they were giving as advice and then subsequently they asked me to review a case, and also to provide the testimony regarding my opinions about their literature.

Q. And was any of the evidence you have ever given critical of the Jehovah's Witnesses?

A. Not specifically that I know.

Q. Have you given evidence in any court case on behalf of any other organisation?

A. I have.

Q. Which other organisations have you given evidence on behalf of?

A. The State of Washington child welfare system.

1 Q. Anyone else?
2 A. That's all that I know now.
3
4 Q. Were you critical of the State of Washington?
5 A. No, I - well, I was saying that they had met the
6 standards of care.
7
8 Q. When did you give that evidence?
9 A. About seven months ago.
10
11 Q. Seven months. Has the case been decided by the judge?
12 A. Yes.
13
14 Q. What happened?
15 A. They found for the defence.
16
17 Q. Do you know the name of the case?
18 A. That is Hamrick, H-A-M-R-I-C-K v State of Washington.
19
20 Q. Which court was it in, do you know?
21 A. Washington State.
22
23 MR STEWART: Q. You also provided testimony, at least by
24 affidavit, in a case for the Boy Scouts of America; isn't
25 that right?
26 A. Yes.
27
28 Q. In September 2013?
29 A. In a court case? In a court testimony case.
30
31 Q. United States District Court of Washington, by
32 affidavit?
33 A. Oh, okay.
34
35 Q. At least - I don't know whether there was oral --
36 testimony after that.
37 A. Yes.
38
39 Q. For the Boy Scouts?
40 A. That's right.
41
42 Q. Are there others where you have provided written
43 evidence, although you may not have given oral evidence?
44 A. Yes.
45
46 Q. For what other organisations?
47 A. So - for other organisations or other cases?

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Q. Well, other organisations and then in respect of each, the cases?

A. Okay, because generally what happens, if somebody wants me to provide expert consulting or expert testimony, then I ask them to send me the case and I review the case and then I tell them orally what I think, and then they either ask me to write a report or offer testimony or they don't. And so, that's generally how I determine or how they determine whether or not they want me to move forward and testify.

Q. In respect of those that you have given a report to be used in a case, for which organisations?

A. There was a - I would have to go back to make sure that I'm not missing anything.

Q. Well, as best you can remember, Dr Applewhite?

A. Yes. I've offered testimony by way of deposition in a case that was - well, it was against the United States government, the defence department. But in that case it was testimony for the plaintiff. And there was also one that was - I just would have to look, I'm sorry. I would have to go back to my notes.

Q. Other than that one you have mentioned against the US Government Department of Defence, are there others in which you have acted for the plaintiff?

A. Yes. I can recall one in which - it was against a school district in which a volunteer had come in and he volunteered, and then he stayed and started taking students to the bathroom and he sexually abused them in the bathroom, and in that case, I testified that they had not met the standard of care.

Q. There is reference in some of the correspondence, I see, to the Baker case. Is that one of the cases that you worked in for the Jehovah's Witnesses?

A. That was for the Jehovah's Witnesses, yes.

Q. What was that case?

A. I was asked really to provide testimony regarding the structure and governance of the Jehovah's Witnesses, and that was a case in which a girl was sexually abused by a man who had once been a ministerial servant.

Q. Is that one of the cases that you refer to as the

1 three in the United States and one in the United Kingdom -
2 is that one of those?

3 A. That's the one in the United Kingdom.

4

5 Q. In this particular case, when were you first asked -
6 in other words, this hearing - by the Jehovah's Witnesses
7 whether you would provide an opinion?

8 A. I don't remember the exact date. I'm sure there is
9 a letter. But I know that it was just before I left for
10 Australia, so it would have been --

11

12 Q. I've seen correspondence going back to 25 May. Would
13 it be as long ago as that?

14 A. Okay. It could be that there was something. I don't
15 recall it being something that I thought about having to
16 look at until I was preparing to leave for Australia. So
17 it would have been either May or June of this year.

18

19 Q. One of the things you mention in your report is the
20 Federal Court Code of Practice for Expert Witnesses. That
21 is in paragraph 8. You say you have been provided with it
22 and you say you have considered all the matters contained
23 in these guidelines when formulating the opinions set out
24 in your statement, and you acknowledge that your opinions
25 are based on your expertise as set out above. Are we to
26 understand from are that that you consider you have
27 complied with the requirements of that guideline?

28 A. Yes.

29

30 Q. I would like to show that guideline to you. Do you
31 have a copy of it? We can provide one to you.

32 A. Thank you.

33

34 Q. In particular, with regard to paragraph 2.1, under the
35 heading "The form of the expert's report" - do you see
36 that?

37 A. Yes.

38

39 Q. It says:

40

41 *An expert's written report must comply with*
42 *rule 23.13 ...*

43

44 We won't trouble you with that:

45

46 *... and therefore must ...*

47

1 And then there are various requirements, (a), be signed by
2 the expert, (b), contain an acknowledgment, and so on. The
3 key ones are possibly starting at (e):
4

5 *Set out separately each of the factual*
6 *findings or assumptions on which the*
7 *expert's opinion is based.*
8

9 So do you consider in your report you have set out each of
10 the factual findings or assumptions on which your opinion
11 is based?

12 A. I believe so.

13
14 Q. And (f):

15
16 *Set out separately from the factual*
17 *findings or assumptions each of the*
18 *expert's opinions.*
19

20 Do you believe your report sets out your opinions
21 separately from the factual findings and assumptions?

22 A. Some are set out separately and then I can think of
23 a couple of opinions that are in the same section with what
24 I consider to be the factual bases.
25

26 Q. We will come back to those when we look at your report
27 in more detail. And (g):

28
29 *Sets out the reasons for each of the*
30 *expert's opinions.*
31

32 So to find your reasons, we will find them in the report;
33 is that right?

34 A. Yes.

35
36 Q. The reasons for your opinions?

37 A. Yes.
38

39 Q. At 2.3, it says:

40
41 *There should be included in or attached to*
42 *the report the documents and other*
43 *materials that the expert has been*
44 *instructed to consider.*
45

46 Now, obviously in this case there is quite a volume of
47 material and it is not attached to your report, and we

1 thank you for that. However, what your report might have
2 done - and this is not a criticism, I'm just trying to work
3 out what we are now going to do about this - is identify
4 those materials. So are you able to identify for us what
5 materials you have had regard to in formulating the
6 opinions that you state in your report? There are
7 obviously those that are specifically mentioned or
8 referenced, but are there others?

9 A. The ones that I specifically relied upon I tried to
10 note, and I do apologise, because I was already fully
11 scheduled when I started working on this, and so I may not
12 have been as conscientious about being sure that those
13 attachments were there. There wouldn't be another source
14 that I know of now that I really relied upon that I didn't
15 include.

16
17 Q. Perhaps you can help us, in any event, as to what the
18 total corpus or total body of the materials was that you
19 had available to you and which you consulted?

20 A. The Jehovah's Witnesses have published much of their
21 material online, and so those are available readily online,
22 and so I consulted some of those materials. I couldn't put
23 my finger on a particular document that I relied upon that
24 I haven't identified. If I saw something that - so because
25 the Jehovah's Witnesses publish so much information about
26 what they believe, it's not uncommon, if you are talking
27 about a particular part of what they do or an aspect of
28 their life, that they might have 40 references to that.

29
30 Q. We've found that.

31 A. So I have - just trying to narrow that down to
32 a particular one that clearly states - that's what I tried
33 to do in the report. It doesn't mean that there aren't
34 other references to it in other places.

35
36 THE CHAIR: Q. Doctor, I think one of the difficulties
37 with the report in the way it has been written is, for
38 example, in paragraphs 45 and 46, where you proffer an
39 opinion, we actually don't know what you have looked at to
40 compare the Jehovah's Witnesses with. Do you see?

41 A. Right.

42
43 Q. We understand what you say about looking at Jehovah's
44 Witnesses material, but before you can proffer an opinion,
45 we need to know what the comparison is, don't we?

46 A. So the way that I structured it, I was trying to - in
47 that whole section, identify the materials that I'm

1 speaking about and then have kind of a concluding --
2
3 Q. That's the Jehovah's Witnesses material.
4 A. Right, you are saying from other organisations.
5
6 Q. You are offering an opinion to us, asking us to accept
7 the opinion that they are better than anyone else, but we
8 don't know what you have looked at, do we, to make that
9 comparison?
10 A. Right. I understand.
11
12 Q. What can we do with that?
13 A. It depends on how much time I have to prepare
14 a response, but I can say, and maybe I should have said
15 here, during the 1980s and 1990s, most religious
16 organisations, faith-based organisations, weren't preparing
17 materials to give to parents and families about sexual
18 abuse, and so --
19
20 Q. Do you know that for Australia? You see, we have to
21 look at Australia, and before we could accept these
22 opinions, I think we would need some foundation for them.
23 A. Sure. And again, it's - these are anecdotal things.
24 I have asked organisations that I have worked with
25 throughout Australia about what is already in place,
26 because I don't like to ignore things that have already
27 happened. So I've asked for those materials and I've
28 seen - for example, there's quite a bit of material
29 available now through governmental entities about normal
30 sexual development in children, and so that's a piece that
31 I would use and say, "Well, you know, you can go to this
32 source". So throughout the time I've worked in Australia,
33 I've always asked for what kinds of materials are the
34 organisations providing, and that's where I arrived at
35 that.
36
37 Q. Yes, but you understand our difficulty, don't you?
38 A. Of course.
39
40 Q. At the moment, I'm afraid we just couldn't --
41 A. You can't accept that.
42
43 Q. -- for ourselves accept that as necessarily the
44 correct outcome, because we don't know what you have looked
45 at.
46 A. Sure.
47

1 Q. Which is one of the things that the Federal Court
2 guidelines were trying to deal with, you understand, when
3 an expert gives evidence?

4 A. Sure.

5

6 MR STEWART: Q. Just returning to the materials on the
7 Jehovah's Witness side of the comparison, I understand that
8 publicly available - in other words, on the internet - the
9 materials are from the period 2000 onwards, and not prior
10 to that; is that your experience?

11 A. 2000 and onward with the materials being available
12 online?

13

14 Q. Yes.

15 A. I wouldn't be able to put a year to that, when it
16 became available online - the publications available
17 online, but approximately.

18

19 Q. You say one of your sources of access to Jehovah's
20 Witnesses material is what is published online, and so
21 then, insofar as materials prior to 2000 are concerned, it
22 would then be materials provided to you by those
23 instructing you, I presume?

24 A. I thought that you were asking me what I had available
25 to me when I was writing the report.

26

27 Q. Yes.

28 A. And those materials were available now, I was writing
29 the report last month.

30

31 Q. Yes, but last month and this month, so I understand,
32 and I'm asking whether this is your experience, what is
33 publicly available on the internet is Jehovah's Witness
34 publications from 2000 onwards. In other words, if you go
35 on to the internet today, jw.org, you are not going to find
36 a resource of pre-2000 publications?

37 A. Sometimes you can, yes, they are from far back.

38

39 Q. So some you can?

40 A. Some you can.

41

42 Q. So some of these articles that you referred to that
43 are back in the 1970s and 1980s, for example, did you
44 access those online or were you provided them separately?

45 A. No, I asked for them.

46

47 Q. How did you know to ask for them?

1 A. Because I had prepared other reports that had to go
2 back in time as well.

3

4 Q. You had seen them previously?

5 A. I had seen those articles previously. So I reviewed
6 a large body of publications in my initial review, and
7 I picked out the pieces that I thought were critical and
8 those were the ones that I already had references to.

9

10 Q. And you also refer to some publications - some
11 documents, letters, for example - from the branch office to
12 elders, which are not available publicly, I take it - those
13 were provided to you?

14 A. Yes.

15

16 Q. Was there other material available to you or provided
17 to you, such as witness statements in this case study, for
18 example?

19 A. No.

20

21 Q. Were you not furnished with Mr O'Brien and Mr Toole's
22 witness statements?

23 A. Oh, yes, there was - Mr O'Brien. I'm sorry, when you
24 say case study, I had forgotten that you are calling each
25 one of these case studies, so case study 29. There were
26 three witness statements that I was provided and I don't
27 recall all of the names but they were the director of the
28 branch and the service director and the legal department
29 director.

30

31 Q. Were you furnished with the statements of either of
32 the survivors who had been the subject of this case study?

33 A. No.

34

35 Q. And did you consider any independent studies or
36 research about the Jehovah's Witnesses?

37 A. No.

38

39 MR STEWART: I'm not sure what time your Honour would like
40 to break?

41

42 THE CHAIR: We will go through until 11.30.

43

44 MR STEWART: Q. There are really two issues that you
45 address in your report, and you identify them as issue 3
46 and issue 4, taken from the terms of reference, and issue 3
47 you identify on page 4 of your report. Do you see that:

1
2 *Issue 3 Case Study 29 Information*
3 *regarding the systems, policies and*
4 *procedures in place within the Jehovah's*
5 *Witnesses Church for raising and responding*
6 *to allegations or concerns about child*
7 *sexual abuse ...*
8

9 So that's the first issue you were asked to form and
10 provide an opinion on; am I right?

11 A. That's right.

12
13 Q. The second issue is regarded as that labelled at issue
14 4, which commences towards the foot of page 7 of the
15 report.

16 A. That's right.

17
18 Q. Dealing with the first issue, as I read and understand
19 the report, firstly, you set out in paragraphs 9 to 21 some
20 background material which presumably forms some basis or
21 substratum to your opinion; is that right?

22 A. That's right.

23
24 Q. And then, in paragraphs 22 to 35, you identify the
25 facts on which you rely to then express the opinion in 36;
26 is that right?

27 A. Yes, and as I'm reading this, I see that I've - I'm
28 sorry, I see that in paragraph 23, I cited the wrong -
29 I cited the wrong resource.

30
31 Q. That "Brief Review of Contemporary Sexual Offence" --

32 A. Yes, it's actually the history that has been
33 published. So I didn't mean to interrupt you, but - yes,
34 those would be the ones that I used to formulate those -
35 the opinion on 36.

36
37 Q. And the opinion you express - well, firstly, perhaps
38 to get it out of the way, in the second sentence of
39 paragraph 36, you say:

40
41 *Because I have not reviewed any specific*
42 *cases, I am not able to offer opinions*
43 *regarding whether the implementation of*
44 *these guidelines have ultimately resulted*
45 *in law-abiding responses, good practice of*
46 *child protection or compassionate care of*
47 *those who have experienced abuse.*

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So as I understand it, you are putting aside the question of implementation, what you have done is essentially a documentary review; is that correct?

A. That's correct.

Q. The first sentence of paragraph 36, then, expresses your opinion with regard to that documentary review; is that right?

A. That's right.

Q. On issue number 3?

A. That's right.

Q. What you do is you really do a comparison. On the one side of the comparison you have got the Jehovah's Witnesses, and on the other side of the comparison you have got religious organisations throughout the world; is that right - this is in the third sentence of paragraph 26?

A. Yes.

Q. So you say:

... the current messages to those who have experienced abuse and the guidelines that have been provided to elders in congregations of Jehovah's Witnesses are consistent with, and in some respects better than, the current practices of religious organisations throughout the world.

A. That's right.

Q. Dealing with the second side of the comparison first, the current practices of religious organisations throughout the world, it's really the same point that was raised by his Honour in relation to another paragraph - you will see the difficulty there: we don't know what those current practices are. You haven't identified them.

A. Right.

Q. Or what religious organisations they are?

A. That's right.

Q. It's quite a big claim, "religious organisations throughout the world" - I take it you would like to limit

1 that in some way?
2 A. Sure.
3
4 Q. You don't claim to have knowledge of current practice
5 of religious organisations throughout the world, do you?
6 A. No.
7
8 THE CHAIR: Q. Can I just understand, what do you mean
9 by "current messages"?
10 A. What I mean by "current messages" is what they say in
11 their publications to people who have experienced abuse;
12 about the healing process and the need to talk with other
13 people; even to the messages, for example, if somebody has
14 experienced abuse and they see in a publication that people
15 are being told to be kind to those who have experienced
16 abuse, and things of that nature. That's what I mean.
17
18 Q. Back at paragraph 25 you talk about elders being
19 instructed to treat victims with kindness and to follow the
20 established internal ecclesiastical procedures for
21 allegations of abuse?
22 A. Yes.
23
24 Q. When you speak of "current messages", are you
25 capturing those matters as well in current messages?
26 A. When I speak of current messages I'm speaking less
27 about the procedures that they have in place for their
28 internal governance questions and more about the general
29 publications for individuals.
30
31 Q. Because procedures send messages too, don't they?
32 A. Yes.
33
34 Q. In fact, the procedures that are followed may be much
35 more powerful in giving a message than a publication.
36 A. It's possible.
37
38 Q. Have you looked at the procedures?
39 A. The current procedures?
40
41 Q. Yes.
42 A. Yes.
43
44 Q. Did you look at past procedures as well?
45 A. I have.
46
47 Q. We will come to those.

1 A. Okay.

2

3 MR STEWART: Q. Insofar as the first half of the
4 comparison is concerned, the Jehovah's Witnesses
5 themselves, of course, if any of the factual matters you
6 have identified as underpinning that opinion ultimately
7 turn out to be mistaken, then that would throw the opinion
8 into question, wouldn't it?

9 A. We're speaking about opinion 36?

10

11 Q. Yes.

12 A. If information were to arise that shows that that is
13 not correct, then the opinion would be incorrect.

14

15 Q. Well, let's be clear about it: if information is to
16 arise or be presented which shows that one or other of the
17 factual matters set out preceding paragraph 36 is
18 incorrect, then that would throw the opinion expressed in
19 the first paragraph of 36 into question?

20 A. Into question, yes.

21

22 Q. Can I take you to paragraph 10 of your report. You
23 can read that paragraph, but, in particular, when you get
24 to the last sentence, which says:

25

26 *Elders are viewed as fellow workers by*
27 *their Fellow elders and by other*
28 *congregational members.*

29

30 Congregational members are referred to as publishers; is
31 that right?

32 A. In some cases, yes.

33

34 Q. I will use that terminology interchangeably with
35 congregational members. Of course, you can't say, really,
36 how congregational members view their elders, can you?

37 A. I would say based on publications.

38

39 Q. Well, there is no empirical study, is there, as to how
40 congregation members view their elders, is there?

41 A. If there is an empirical study, I'm not aware of it.

42

43 Q. Ultimately, that's a subjective question, in the sense
44 that it's what is going on in the minds of the congregation
45 members that you are addressing yourself to?

46 A. What I'm really addressing is the messages that are in
47 the materials for elders and the materials that are in the

1 publications that speak to that particular question.
2
3 Q. And those materials are published by the Governing
4 Body in Brooklyn?
5 A. That's right.
6
7 Q. And distributed throughout the world?
8 A. That's right.
9
10 Q. They are certainly not published by the congregation
11 members?
12 A. No, they are not.
13
14 Q. You are aware, I take it, that in the Jehovah's
15 Witness faith elders are regarded as being appointed by the
16 holy spirit?
17 A. My understanding was that they are appointed but with
18 the guidance of the holy spirit.
19
20 Q. Let's take a quick look at that. I would like you to
21 look at tab 109 of our tender bundle, which will go up in
22 front of you on the screen.
23 A. Okay.
24
25 Q. We can show you the first page of that. You will be
26 familiar with this textbook, I take it, "Organised to Do
27 Jehovah's Will"?
28 A. Yes.
29
30 Q. You have looked at this before formulating your
31 report?
32 A. Yes.
33
34 Q. This applied from 2005 and thereafter?
35 A. There was a previous version of it, but it wasn't
36 called the same name.
37
38 Q. Yes, the previous version and testimony that you have
39 given in one of the other cases really concerned the
40 previous version; is that right?
41 A. Yes.
42
43 Q. And this is given to - if we just scroll down a little
44 bit, you will see it says "This book is issued to", and
45 there is space to fill it in, and the place and date of
46 baptism. It is given to baptised publishers in the
47 Jehovah's Witness Church, as I understand it, on the

1 occasion of their baptism; is that your understanding?
2 A. That's my understanding.

3
4 Q. If we have a look at page 28 of that report --
5 A. It might be easier for me to have --

6
7 Q. Indeed, it probably will be. We will organise one.
8 A. It is a little bit hard for me to - thank you.

9
10 Q. You will see in 28, halfway down, it says:

11
12 *We are grateful for the spirit-appointed*
13 *overseers in the congregation.*

14
15 Do you see that?

16 A. Yes.

17
18 Q. If we look at 29, at the top of 29:

19
20 *Qualifications for overseers.*

21
22 Now, just to clarify, in this publication, the phraseology
23 "overseers" is what is now referred to as elders; is that
24 right?

25 A. There are other kinds of overseers, but here I think
26 they are referring to elders.

27
28 Q. And you will see in the second sentence it says:

29
30 *Only if they qualify can it be said that*
31 *they are appointed by holy spirit.*

32
33 And there is a scriptural reference.

34 A. Yes.

35
36 Q. At the top of page 37, which is Ringtail 23, it says:

37
38 *Their course of conduct and the fruits of*
39 *their labours would give evidence that they*
40 *are appointed by holy spirit.*

41
42 So you accept that in the view of the Jehovah's Witnesses,
43 the elders are appointed by the holy spirit? My team can
44 dig out another 40 references for you, Dr Applewhite.

45 A. No, I - yes.

46
47 Q. If we go back to page 30, towards the foot of the

1 page - Ringtail 16 - Dr Applewhite, just for clarification,
2 you can ignore my references to Ringtail, that's for the
3 operator putting documents on the screen. You will see in
4 the lower paragraph on that page:

5
6 *Although the Scriptural requirements may at*
7 *first seem to be somewhat overwhelming,*
8 *there should be no reason for Christian men*
9 *to shy away from desiring the fine work*
10 *associated with the office of overseer. By*
11 *taking the lead in manifesting fine*
12 *Christian qualities, overseers encourage*
13 *other members of the congregation to do the*
14 *same.*

15
16 So it is the case, isn't it, that overseers are required
17 and expected to take the lead in the congregation?

18 A. Here it is saying that they need to be a good role
19 model. They certainly have a leadership role, but there is
20 no question about that.

21
22 Q. On page 31 we will see at the top of the page:

23
24 *Though standing before the congregation as*
25 *appointed overseers are required to be*
26 *taking the lead.*

27
28 And the congregants would see them as the congregational
29 leaders, wouldn't they?

30 A. Yes.

31
32 Q. At 32, you will see that, towards the end of the first
33 paragraph, about eight or 10 lines down, it says:

34
35 *Others in the congregation would be moved*
36 *to imitate this fine example and entrust*
37 *their spiritual life to the shepherds'*
38 *care.*

39
40 In other words, congregants regard themselves as entrusting
41 their spiritual life to the care of the elders; is that
42 right?

43 A. Yes.

44
45 Q. And also on that page, at the foot of the page:

46
47 *Exercising oversight of the affairs of the*

1 *congregation requires a man to demonstrate*
2 *a measure of orderliness ...*

3
4 And so on. So elders exercise oversight over the affairs
5 of the congregation, don't they?

6 A. They do.

7
8 Q. As you have set out in your report, elders are
9 responsible for investigating reports of wrongdoing; is
10 that right?

11 A. They are.

12
13 Q. And in the case of, according to the rules that are
14 set out, them finding that there is sufficient evidence for
15 that, if there is series wrongdoing, they then establish
16 a judicial committee; that's right, isn't it?

17 A. I'm sorry, can you repeat that question?

18
19 Q. Yes, of course. It is also the case, isn't it, that
20 the elders, on finding that an allegation of serious
21 wrongdoing is sufficiently proved, or evidenced, they then
22 establish a judicial committee?

23 A. That's correct.

24
25 Q. And the judicial committee of three elders will
26 essentially have a form of a hearing and make a decision in
27 relation to that wrongdoing?

28 A. That's correct.

29
30 Q. Including as to sanctions?

31 A. Yes.

32
33 THE CHAIR: Q. Just so we make sure we are on common
34 ground, all of the elders are men, aren't they?

35 A. They are.

36
37 Q. So the process of investigation and determination
38 involves only men?

39 A. That's right.

40
41 THE CHAIR: We will take the morning adjournment.

42
43 **SHORT ADJOURNMENT**

44
45 MR STEWART: Q. Dr Applewhite, what we have gone through
46 is that elders are appointed by the holy spirit, they are
47 required to take the lead, congregants entrust their

1 spiritual lives to the elders, elders exercise oversight
2 over the congregation and investigate, and, if you like,
3 prosecute allegations of wrongdoing. I suggest the
4 consequence of that is that the statement in paragraph 10
5 of your report, which says "Elders are viewed as fellow
6 workers by their fellow elders and by the other
7 congregational members", the other congregational members,
8 is wrong.

9
10 THE CHAIR: Q. You are being invited to respond to that.
11 A. Okay. Well, first, the distinction that I'm making
12 here is the distinction between elders in the Jehovah's
13 Witnesses congregations and, for example, someone who
14 becomes an ordained minister in another organisation, so
15 becomes an officer in the Salvation Army, becomes a priest
16 in the Anglican or the Catholic Church, and that
17 distinction is what I'm pointing to here. I recognise that
18 they are spiritual leaders and in the list you just gave
19 you said they trust their spiritual lives to the elders,
20 they trust their spiritual lives to the shepherding and
21 guidance of the elders, but not intended to turn it over to
22 the elders.

23
24 MR STEWART: Dr Applewhite, a few things --
25 A. May I just finish?

26
27 Q. Of course.

28 A. That's just one piece of what you said that I wanted
29 to mention. But the distinction I'm making is the setting
30 apart, and there is quite a bit in the literature about not
31 lording over other people or being considered someone who
32 is closer to God in any way, or distinctive for the rest of
33 their life. So that's a distinction that I'm making.
34 There is no question whatsoever that they are in a
35 leadership role, that they are trusted and that they are
36 meant to offer guidance to people, particularly about their
37 spiritual lives.

38
39 Q. Insofar as that is a point you are seeking to make, of
40 course, there is nothing in that sentence or in that
41 paragraph about comparing or distinguishing the Jehovah's
42 Witnesses practice to anyone else - you are saying that in
43 the Jehovah's Witnesses, elders are viewed by other
44 congregation members as fellow workers.

45 A. Well, actually, it says "there is no particular
46 sustained relationship between the elder and circuit
47 overseer the way there is with a pastor to a bishop in

1 other organisation". So there is a reference to it. But,
2 you are right, but I didn't make that specific point.

3
4 Q. That's the one point you make, and then you make
5 a separate point, which I suggest to you is wrong - they
6 are the shepherds; they are not the sheep.

7 A. They are the shepherds.

8
9 Q. Yes, not the sheep; they are not the fellow workers,
10 they are not seen like that. Elders are not seen like that
11 by the congregants?

12 A. So you are saying how the congregation members see
13 them?

14
15 Q. Well, I can't say that any more than you can in the
16 absence of doing an empirical study, but using the
17 materials that you used, I say your conclusion is wrong.
18 Elders are in a position of prestige, aren't they?

19 A. "Prestige" is probably not a word that I would see in
20 their literature or the way that they would hope that an
21 elder would present themselves.

22
23 Q. They are in a position of honour?

24 A. It is an honour.

25
26 Q. And in many senses it is the antithesis to "fellow
27 workers"?

28 A. For me, what the elder is meant to present or the
29 elder is to present is not the antithesis of fellow worker;
30 it might be distinctive, but I don't see it as the
31 antithesis.

32
33 Q. You mentioned that they are not closer to God -
34 I mean, that's not right, is it? They are regarded as
35 being appointed by the holy spirit - the elders are.

36 A. So you feel that makes them closer to God?

37
38 Q. I would understand so, yes, but apparently, you have
39 a different understanding of closeness to God?

40 A. The literature just doesn't set them apart as
41 distinctive or in some ways superior.

42
43 Q. I will submit to the contrary in due course, but
44 perhaps we can move on. If we look at paragraph 18 of your
45 report, you will see it says that the elders are:

46
47 *... the local spiritual leaders of the*

1 *congregations, and they offer spiritual*
2 *guidance to congregation members on their*
3 *own initiative or to those who ask for such*
4 *help.*

5
6 It says:

7
8 *They are the only members of the*
9 *congregation authorised to provide pastoral*
10 *care, which is meant to provide for the*
11 *spiritual wellbeing of all congregational*
12 *members.*

13
14 And then you make essentially the same point, although more
15 specifically about ministerial servants, in paragraph 20.
16 You say:

17
18 *Ministerial servants are members of the*
19 *congregation who provide non-pastoral*
20 *practical assistance and service to the*
21 *elders and the congregation. Ministerial*
22 *servants are not authorised to provide*
23 *spiritual guidance, counselling or any*
24 *other pastoral services to members of the*
25 *congregation.*

26
27 So you say elders are the only ones who are authorised to
28 do that, and ministerial servants are not authorised.
29 That's not quite right, is it?

30 A. Can you tell me how it is not quite right?

31
32 Q. Well, the case that you testified in in the United
33 Kingdom, you gave evidence on precisely this point, and it
34 was rejected by the judge, wasn't it?

35 A. I'm not sure that that particular point was rejected
36 by the judge.

37
38 Q. Perhaps we can take a look at the judgment.

39 A. You are saying the point that ministerial servants are
40 not authorised to provide pastoral care?

41
42 Q. Yes, or spiritual guidance, counselling or any other
43 pastoral service. Could we have the judgment on the
44 screen? If we look at the first page first. You will see
45 that this was 19 June 2015, the honourable Mr Justice
46 Globe, and it is set out between A and the trustees of the
47 Watchtower Bible & Tract Society and the trustees of the

1 Loughborough Blackbrooke Congregation and the trustees of
2 the Loughborough Southwood Congregation and in particular
3 we go to paragraph 16 which is at the --
4

5 THE CHAIR: What court is this?
6

7 MR STEWART: The High Court of Justice Queen's Bench
8 Division, Royal Courts of Justice, The Strand. You will
9 see paragraph 16 says:
10

11 *There is evidence in the case that*
12 *ministerial servants are not supposed to*
13 *have any independent pastoral or*
14 *shepherding role. The evidence comes from*
15 *a number of past and present elders,*
16 *particularly from Paul Gillies, who is ...*
17 *a member of the British branch committee*
18 *and an overseer. It also comes from*
19 *Dr Monica Applewhite who has written*
20 *a report about the structure and governance*
21 *of Jehovah's Witnesses. She is an American*
22 *expert in clinical social work, whose*
23 *previous experience and expertise in*
24 *relation to Jehovah's Witnesses is limited*
25 *to being requested by the Watchtower*
26 *Society to review three separate Jehovah's*
27 *Witness civil liability cases. Whether or*
28 *not a ministerial servant is supposed to*
29 *have any independent pastoral or*
30 *shepherding role is an issue in the case.*
31 *Specifically, it is an issue whether Peter*
32 *Stewart ...*
33

34 He was the wrongdoer in that case, wasn't he?

35 A. He was.
36

37 Q.

38 *... was acting in any such role towards the*
39 *claimant and her family at the material*
40 *time. Insofar as reliance is placed by the*
41 *defendants upon The Organised Book:*
42 *Organised to Accomplish Our Ministry*
43 *chapter 6 p.55-59, it is worthy of note*
44 *that at p.56 it states 'their work within*
45 *the congregation generally involves*
46 *non-teaching responsibilities' ... and at*
47 *p.58-59 it states that, 'if there are not*

1 *enough elders to conduct the congregational*
2 *book studies, some of the more qualified*
3 *ministerial servants are used as study*
4 *conductors to care for assigned groups.*
5 *They may be assigned to handle parts in the*
6 *service meeting and the theocratic ministry*
7 *school and to deliver public talks in the*
8 *local congregation. Other privileges may*
9 *be extended to some of the ministerial*
10 *servants where there is particular need and*
11 *they meet the requirements for the*
12 *assignment'.*

13
14 So that book referred to there was the pre-1991 manual for
15 elders, wasn't it?

16 A. Yes.

17
18 Q. And the 1991 and thereafter manual has essentially the
19 same passages, doesn't it?

20 A. It has.

21
22 Q. If we have a look at tab 109 --

23 A. Before we leave this?

24
25 Q. Yes.

26 A. So I think that you are asking me whether ministerial
27 servants - if they are - what I have said is that they are
28 not responsible for pastoral care.

29
30 Q. You say they are not authorised.

31 A. May I just continue?

32
33 Q. Yes.

34 A. In here, they are talking about teaching and Bible
35 study. There are many people who are authorised to teach,
36 to conduct Bible study, and to take parts of the teaching
37 role at the Kingdom Hall, and so this particular paragraph,
38 I just wanted to mention, is about teaching and not about
39 pastoral care.

40
41 Q. Let's have a look at what this particular subsequent
42 edition states at tab 120 --

43
44 THE CHAIR: I'm sorry, you say your paragraph is about
45 teaching, is it?

46 A. The paragraph that is cited from the London case is --

47

1 Q. That paragraph involves - it referred to non-teaching.
2 A. Generally, the work is non-teaching. However, they do
3 have, sometimes, teaching roles, which, from my
4 perspective, is different than spiritual guidance or
5 pastoral care.

6
7 Q. What's the difference?

8 A. So a teaching role, for them, would be standing up at
9 a meeting and going through The Watchtower, teaching
10 a preassigned lesson or in a home, would be with a group of
11 people overseeing a Bible study, and pastoral care would be
12 someone coming and saying "I'm having trouble in my family,
13 I need someone to talk to". So that's the distinction that
14 I'm making. When it comes to access or opportunities, in
15 analysing cases, there is a distinction between the access
16 that is provided by pastoral care.

17
18 MR STEWART: Q. You will see there that his Lordship in
19 paragraph 16 particularly says that whether or not
20 a ministerial servant is supposed to have any independent
21 pastoral or shepherding role is an issue in the case.

22 A. Yes.

23
24 Q. So that was an issue in the case?

25 A. It was an issue in the case, yes.

26
27 Q. If we have a look at tab 109 --

28 A. Is that a different document?

29
30 Q. Yes. At page 57 --

31 A. Is this from the current version?

32
33 Q. This is from the document we showed you earlier,
34 Organised to Do Jehovah's Will, 2005 onwards?

35 A. Oh, okay. Wait, I have it. All right. Okay.

36
37 Q. You will see at the foot of the page. This is dealing
38 with ministerial servants:

39
40 *Depending on local circumstances, there may*
41 *be other services that can be assigned to*
42 *ministerial servants who are doing as the*
43 *apostle Paul encouraged young Timothy,*
44 *'making their spiritual advancement*
45 *manifest.'* *If there are not enough elders*
46 *to conduct the Congregation Book Studies,*
47 *some of the more qualified ministerial*

1 *servants may be used as Congregational Book*
2 *Study servants to care for assigned groups.*
3 *They may be assigned to handle parts in the*
4 *Service Meeting and on the Theocratic*
5 *Ministry School and to deliver public talks*
6 *in the local congregation. Other*
7 *privileges may be extended to some of the*
8 *ministerial servants when there is*
9 *a particular need and if they meet the*
10 *requirements for the assignment.*

11
12 I suggest, on the basis of that, there are circumstances in
13 which, from time to time, ministerial servants are
14 authorised to undertake pastoral care?

15 A. I haven't seen those circumstances.

16
17 Q. You haven't seen any circumstances, as I understand
18 it. You have done a review of the documents, not the
19 practices.

20 A. I haven't seen examples that have been given in the
21 publications or in the few cases that I have reviewed,
22 I haven't seen a ministerial servant assigned to something
23 that would be considered pastoral care.

24
25 Q. But you would accept that it is envisaged that the
26 elders in a congregation may involve ministerial servants
27 in pastoral care?

28 A. That's just not my understanding of their practices.

29
30 Q. Leaving practices to one side, let's deal with what
31 the documents teach them. I'm suggesting that on
32 a reasonable reading of this, it is clear that there are
33 circumstances in which an elder may authorise a ministerial
34 servant to undertake pastoral care in a congregation?

35 A. So since we're reading, the beginning of this section,
36 they describe what ministerial servants normally do,
37 keeping the Kingdom Hall clean and caring for the
38 publications and so forth. Then they describe certain
39 assignments or privileges that involve teaching, and my
40 understanding is that there is a distinction for them
41 between who is authorised to provide person-to-person
42 spiritual guidance or pastoral care. That's my
43 understanding.

44
45 Q. But based on what?

46 A. Based on the reading of these publications and based
47 on the examples that are given. It is very common in the

1 publications that they will describe scenarios and give
2 examples, and I've never come across that.

3

4 Q. Perhaps we can look at the document at tab 120, it is
5 the document Shepherd the Flock of God, which is the
6 current elders textbook you will be familiar with. Do you
7 have a hard copy?

8 A. I have a hard copy.

9

10 Q. In particular, at page 24. You will see the first
11 bullet point there - this is dealing with a group overseer:

12

13 *Assists and trains ministerial servants in*
14 *the group to reach out and qualify for*
15 *congregation responsibilities.*

16

17 A. Mmm-hmm.

18

19 Q.

20 *It is best that another elder accompany him*
21 *when visiting someone in the group having*
22 *serious problems. However, he may select*
23 *a qualified ministerial servant to*
24 *accompany him when visiting publishers to*
25 *offer encouragement, which will allow the*
26 *overseer to observe how the servant reasons*
27 *on matters.*

28

29 The circumstance envisaged there is one of pastoral care,
30 isn't it?

31

32 A. The ministerial servant would be being asked to
33 consider what publications they might provide, what prayer
34 they might provide or if there is an experience he wanted
35 to share. Yes.

35

36 Q. And the ministerial servant would be involved in
37 delivering that pastoral care along with the elder?

38

39 A. My understanding is that the elder would be providing
40 pastoral care and, in certain occasions, maybe when
41 considering someone to be an elder, might ask a ministerial
42 servant to accompany him.

42

43 Q. Your understanding is based on what is written there?

44

45 A. For me, this is different than giving someone
46 a pastoral care assignment.

46

47

47 Q. But when you say it is your understanding, is that

1 based on that paragraph there - that's your understanding
2 of what that paragraph is saying?

3 A. That's what this paragraph is saying. If you would
4 just read the last sentence there it says:

5
6 *Afterward, the overseer reviews with the*
7 *ministerial servant the reason the call was*
8 *handled the way it was.*

9

10 So it is meant to be an observation, an instructional
11 opportunity.

12

13 Q. It certainly doesn't exclude participating in the
14 pastoral care itself with the elder?

15 A. It doesn't.

16

17 Q. So I suggest that paragraphs 18 and 20, where you say
18 that only elders are authorised to provide pastoral care
19 and that ministerial servants are not authorised to provide
20 spiritual guidance, counselling or any other pastoral
21 services, it is incorrect?

22 A. I could add to that with more detail, but I don't
23 consider the statement itself incorrect.

24

25 Q. If we have a look at your paragraph 21, you say in the
26 last sentence:

27

28 *None of the responsibilities of*
29 *a ministerial servant or elder allow or*
30 *require that he be alone with children or*
31 *otherwise separate a child from his or her*
32 *family.*

33

34 Now, that's not right in respect of allowing an elder to be
35 alone with children, is it? There may be circumstances in
36 which an elder is allowed to be alone with a child,
37 mightn't there?

38 A. Their own children?

39

40 Q. No, other children in the congregation?

41 A. I don't know those circumstances.

42

43 Q. If we look at tab 97, you will see this is a direction
44 from the nominee from the branch to All Bodies of Elders,
45 and it deals with the subject of child molestation. In
46 particular, if we look at the third paragraph:

47

1 *Those who are appointed to privileges of*
2 *service, such as elders and ministerial*
3 *servants, are put in a position of trust.*
4 *One who is extended privileges in the*
5 *congregation is judged by others as being*
6 *worthy of trust. This includes being more*
7 *liberal in leaving children in their care*
8 *and oversight. The congregation would be*
9 *left unprotected if we prematurely*
10 *appointed someone who was a child abuser as*
11 *a ministerial servant or elder.*

12
13 So there are circumstances, aren't there, where it is quite
14 allowed for an elder or a ministerial servant to be alone
15 with a child other than their own?

16 A. Well, this - my understanding of this was a warning to
17 let elders know that families might be more trusting of
18 a person and allow their children to be alone with somebody
19 who was a ministerial servant or an elder.

20
21 Q. So there is no prohibition on ministerial servants or
22 elders being alone with a child in the congregation?

23 A. They are not meant to. It's not - in terms of their
24 rules, they're not supposed to meet alone with children.

25
26 Q. What rule can you point to?

27 A. It would take me a little bit of time, but the elders
28 in particular are not supposed to meet alone with women or
29 with children. I would have to spend some time finding --

30
31 THE CHAIR: Q. Does anyone else know where that rule
32 might be?

33
34 MR TOKLEY: We will find out, your Honour.

35
36 MR STEWART: Q. If we go on and look at paragraph 23,
37 I think you have accepted that you have identified the
38 wrong reference there. Can you just give us the name of
39 what the proper reference is? It is not the "Brief Review
40 of Contemporary Sexual Offence and Child Sexual Abuse
41 Legislation in Australia"?

42 A. No, it is the historical overview of --

43
44 Q. Is that also a study that was done for this
45 Royal Commission?

46 A. It was done for the Royal Commission. It is an
47 extensive study with the history as they describe the

1 1980s.

2

3 Q. Then if we look, still in that paragraph, further
4 down, four lines from the bottom, it says:

5

6 *The article ...*

7

8 That's referring to the article "Help for Victims of
9 Incest" -

10

11 *The article tells the story of an elder who*
12 *erred by telling a woman to just forget*
13 *about the abuse and urges readers to listen*
14 *and show compassion. After telling elders*
15 *to be thoughtful, the article also points*
16 *out that some victims of abuse may need to*
17 *talk with an experienced professional*
18 *counsellor.*

19

20 Insofar as it goes, that is of course correct, but there
21 are limitations on what professional support or therapy
22 that Jehovah's Witnesses can employ under their teachings,
23 aren't there?

24

A. Yes.

25

26 Q. For example, there would certainly be restrictions on
27 a survivor - cautions or restrictions on a survivor from
28 participating in group therapy?

29

A. That part I don't know about. The only part I've ever
30 heard is that they would recommend to choose someone who is
31 respectful of their religious beliefs.

32

33 Q. It is worth taking a quick look at that. That's at
34 tab 120, which is "The Shepherd the Flock", and it is at
35 page 131, Ringtail 132. I beg your pardon, I have got the
36 wrong reference there. Page 55, paragraph 25. You will
37 see the paragraph deals with or says - do you have it?

38

A. I do.

39

40

Q.
41 *There are times when an emotionally distressed*
42 *Christian may seek professional help.*

43

44 By reference to "Christian" there, it is a reference to
45 a member of the Jehovah's Witness faith; is that right?

46

A. That's my understanding of it in this particular text.

47

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Q. *Whether a Christian or his family pursues treatment from psychiatrists, psychologists, or therapists is a personal decision. An elder should not assume the responsibility of recommending a specific practitioner or facility. He may draw attention to or discuss material in the publications that provides cautions regarding therapies that may conflict with Bible principles.*

And various Watchtower references are given. Then it says:

While participating in a group therapy by a professional therapist is a matter for personal decision, there could be a revealing of confidential facts about other members of the Christian congregation during such sessions if a Christian does not exercise discretion.

So you will see there that participation in group therapy is certainly frowned upon, and there are restrictions with regard to it.

A. I saw it as it's frowned upon to talk about other people in group therapy, but that's my reading of it.

Q. It's hard to conceive of group therapy when one doesn't talk about what has happened to one as a survivor?

A. Right.

Q. You would accept that?

A. Absolutely.

Q. And if it was one's father or uncle or teacher or elder or ministerial servant, one wouldn't be able to get the benefit of the group therapy without saying who it was who abused me?

A. Right. Right.

Q. So there would be very substantial restriction, according to this, on a Witness's ability to participate in group therapy?

A. Yes, I just - well, it says it's a matter for personal decision and to use discretion, but I could certainly see

1 your point.

2

3 Q. You would accept, of course, that group therapy in the
4 case of sexual abuse survivors can be a very important form
5 of therapy, depending upon the particular case?

6 A. Absolutely. No question about it.

7

8 Q. In paragraph 26, you say that elders are instructed to
9 report crimes according to the law. Do you see that?

10 A. I am sorry, I thought you said I said --

11

12 Q. I beg your pardon. I was very unclear. I am in your
13 report now, paragraph 26.

14 A. Okay.

15

16 Q. Do you see that:

17

18 *Elders are instructed to report crimes*
19 *according to the law ...*

20

21 And then in paragraph 27 you say:

22

23 *Bodies of Elders have been instructed to*
24 *follow the mandatory reporting laws of*
25 *their State or country and to call the*
26 *Branch Legal Department for legal advice*
27 *regarding reporting requirements if anyone*
28 *reports an allegation of sexual abuse to*
29 *them.*

30

31 Just to get that straight, the instruction first is to
32 contact the branch office; is that right?

33 A. That's right.

34

35 Q. Then if the branch office advises that there is
36 a mandatory reporting requirement, they must then report;
37 is that right?

38 A. That's right.

39

40 Q. So what you don't mean to imply in paragraph 26 is
41 that generally elders are instructed to report by -
42 according to "the law", you mean when the law requires it?

43 A. Under mandatory reporting.

44

45 Q. In your paragraph 33 you say:

46

47 *Regardless of the outcome, the*

1 *deliberations of a judicial committee and*
2 *the information they consider are kept*
3 *confidential.*

4
5 Then you go on to say:

6
7 *Like most Christian denominations,*
8 *Jehovah's Witnesses strive to create*
9 *a spiritual environment that allows the*
10 *opportunity for sinners ...*

11
12 And so on. Firstly, you appreciate, I take it, I think it
13 is in your report that a judicial committee must pass on
14 the findings and significant information about them to the
15 branch office?

16 A. Yes.

17
18 Q. So insofar as there is confidentiality, it is not
19 confidentiality to those who are dealing with it; it
20 involves also giving it to others, effectively, at the
21 country headquarters?

22 A. I just want to understand - when you say those who are
23 involved, do you mean --

24
25 Q. The members of the judicial committee.

26 A. Maybe you could ask me again, I just had trouble
27 following.

28
29 Q. Yes. So when you say that the outcome and
30 deliberations of the judicial committee and the information
31 they consider are kept confidential, you don't mean they
32 are kept confidential just to the members of the judicial
33 committee?

34 A. No, I should say confidential, a need-to-know basis,
35 versus publicly reported.

36
37 Q. And quite unlike the case of the Catholic sacrament of
38 confession, for example?

39 A. The judicial committee itself would be different than
40 a seal of confession in the Catholic church.

41
42 Q. In the Catholic Church, it is between the penitent,
43 I think is the correct word, and the priest, and it goes to
44 no-one else, not the bishop, not anyone?

45 A. That's correct.

46
47 Q. And whilst in the pastoral work of an elder there may

1 be circumstances in which someone confesses in a cleansing
2 of sin way, really, it is quite different in a judicial
3 committee, which is a fact-finding inquiry, isn't it?

4 A. Yes. For me, as long as there are more than two
5 people in the room, it's not ordinarily considered
6 a confession in that sort of technical sense.

7
8 Q. Dr Applewhite, just summing up, then, on that first
9 section of your report dealing with issue number 3,
10 I suggest that the Royal Commission cannot accept the
11 opinion that you express in paragraph 36 as supported by
12 the material presented by you?

13 A. In 35?

14
15 Q. In 36.

16 A. In 36? Are you asking me if I agree with that
17 suggestion?

18
19 Q. Well, I am giving - yes, or if you don't, I'm giving
20 you the opportunity to respond to it, because that is what
21 I will submit in due course and I need to be fair to you.

22 A. Well, the first work that I did in Australia was to -
23 I went to Brisbane and Sydney and Adelaide and there were
24 educational programs that were opened up to anyone who
25 wanted to participate. So there were people from social
26 services and faith-based organisations and schools, and in
27 that process before I came to do those very first
28 workshops, I did a review to see what was available. There
29 was quite a bit of empirical research that has come out of
30 Australia. I reviewed the empirical research that was
31 here, as well as through the documents that were available
32 to religious organisations and schools, and so that's the
33 review that I did.

34
35 And I have tried my best to keep up with all the
36 publications that have been part of religious organisations
37 in terms of making sure that the recommendations that I do
38 provide at educational programs are meeting a standard of
39 care, and if there are new things that have evolved or
40 studies that have been published, to make sure that
41 I review those before I offer recommendations. So that's
42 the basis for the opinion.

43
44 Q. Addressing particularly the Jehovah's Witness
45 procedure and practice, insofar as it is set out in the
46 documents, about dealing with complaints or allegations of
47 child sexual abuse, the first step is that two elders are

1 to investigate; is that right?
2 A. Yes.
3
4 Q. On an elder hearing of such an allegation?
5 A. Yes.
6
7 Q. Two elders must investigate. That includes
8 interviewing the complainant?
9 A. Yes, if there is a complainant, versus a Witness, yes.
10
11 Q. And those two elders of course are necessarily men?
12 A. Yes. Elders are all men.
13
14 Q. And very often, the complainant is a woman,
15 the survivor, or a child?
16 A. I don't know the statistics. I don't know the
17 percentages.
18
19 Q. You would have to accept that at least very often?
20 A. I can't imagine it being uncommon.
21
22 Q. I can give you the statistics, actually. I will come
23 back to that. Then, if there is sufficient evidence found,
24 a judicial committee is formed - that's right, isn't it?
25 A. That's my understanding, yes.
26
27 Q. And that's comprised of three elders.
28 A. There could be more, but yes, three is ordinarily what
29 would be expected.
30
31 Q. Also, necessarily, men?
32 A. They would have to be men.
33
34 Q. They then would, again, interview or hear evidence
35 from the Witness survivor?
36 A. Are you talking about in current practice?
37
38 Q. Yes.
39 A. In current practice, the survivor could write
40 a letter. The survivor wouldn't necessarily have to meet
41 with everyone together.
42
43 Q. That's in an extraordinary circumstance, isn't it, if
44 the survivor is far away?
45 A. Not my understanding.
46
47 Q. Can you identify the origin of your statement with

1 regard to current practice?

2 A. Sure. So if you go to the Shepherd of the Flock of
3 God, also, I think in your documents it may be called the
4 elder handbook.

5

6 Q. Yes, that's at tab 120.

7 A. It would be paragraph 38.

8

9 Q. Which page?

10 A. 72. So it says - they are asking, to begin with, that
11 someone - that it's loving for the witness to first
12 confront the accused, but then it goes on to say that:

13

14 *(For the witness by himself to confront the*
15 *accused may not be advisable in all cases -*
16 *for example, if the witness and the accused*
17 *were involved in sexual immorality together*
18 *or if the witness was a victim of incest or*
19 *rape by the accused or is a child and the*
20 *victim of sexual abuse. Or it may be that*
21 *the witness is extremely timid.)*

22

23 THE CHAIR: Q. That, as I understand it, is a statement
24 about the survivor in the context we're talking,
25 approaching the abuser themselves, isn't it?

26 A. Yes. And as part of the investigation process.

27

28 Q. Well, I'm not sure I understand that to be an
29 investigation step. It is a step that may have
30 consequences for the investigation, but it's being put
31 there as an attempt to, I assume, have the abuser confess
32 to the abuse; is that right?

33 A. As a - leaving out the possibility that somebody - or
34 the likelihood that someone who was sexually abused would
35 have to confront the person.

36

37 Q. Sorry?

38 A. Leaving out the person who was abused having to
39 confront their offenders.

40

41 Q. In order to encourage or persuade the abuser to
42 confess?

43 A. To confess, yes.

44

45 MR STEWART: Q. But the investigative stage is the next
46 paragraph, isn't it:

47

1 *If the accused denies the accusation, the*
2 *investigating elders should try to arrange*
3 *a meeting with him and the accuser*
4 *together.*

5
6 And then it has a note:

7
8 *If the accusation involves child sexual*
9 *abuse and the victim is currently a minor,*
10 *the elders should contact the branch office*
11 *before arranging a meeting between the*
12 *child and the alleged abuser.*

13
14 A. Yes.

15
16 Q. The standard is still to do two things: one, the
17 investigating elders must interview the victim; not so?

18 A. Yes.

19
20 Q. And the standard, with exceptions allowed, possibly
21 from the branch office, is for that meeting to include the
22 survivor confronting the accused?

23 A. I believe we would probably have to go to the letter
24 to the elders from October of 2012.

25
26 THE CHAIR: Q. Just let me make sure we're taking our
27 steps carefully, though?

28 A. Okay.

29
30 Q. 39, as I presently understand it, requires the child
31 or the abused, the survivor, to be present with the abuser,
32 and if that doesn't happen, then the matter is to be left,
33 as it says, in Jehovah's hands; is that right?

34 A. Just a moment, I'm sorry, I just want to make sure
35 I get the reference right. You are on which paragraph.

36
37 Q. 39. So if the accused denies, tries to arrange a
38 meeting, then if the accuser or accused is unwilling to
39 meet, or continues to deny the accusation of a single
40 witness, then it is left, not resolved?

41 A. From their spiritual standpoint. I mean, from my
42 perspective - I mean, I know we're talking about what
43 happens --

44
45 Q. We're talking about factual matters here.

46 A. Right. But there's also the investigation. I mean,
47 if this has a report, there may be a separate investigation

1 going on as well.

2

3 Q. I'm sorry?

4 A. If this had been reported to the police, then there
5 may be a separate investigation.

6

7 Q. If it has gone to the police, but that's different to
8 what we're talking about here.

9 A. Yes.

10

11 Q. We're talking about the Jehovah's Witnesses process.

12 A. Right.

13

14 MR STEWART: Q. You see - you have a hard copy in front
15 of you - this is part of the evidence establishing the
16 wrongdoing process that is from paragraph 37 onwards, and
17 then if there is sufficient evidence, then it goes to
18 a judicial committee. That's at page 89. You will see in
19 paragraph 1, it is provided in bold that the elders on the
20 judicial committee should convey their desire to be helpful
21 and try to put the accused at ease. There is no particular
22 emphasis on putting the survivor at ease, is there?

23 A. I don't know that there is an assumption that the
24 survivor would be in this meeting.

25

26 Q. Perhaps not at the start, but in paragraph 2:

27

28 *If the accused contends that he is*
29 *innocent, the witnesses to the wrongdoing*
30 *should be presented and their testimony*
31 *should be given in the presence of the*
32 *accused.*

33

34 So in other words, if the survivor is one of the witnesses,
35 then she - as it usually is - would have to give evidence
36 in the presence of the three-member judicial committee and
37 the accused?

38 A. That's when their testimony could be given by letter
39 as well, in today's practice.

40

41 Q. If we carry on, it says:

42

43 *However, it may be that the witnesses live*
44 *a great distance away or for some reason*
45 *are not able to be physically present. If*
46 *so, their testimony may be presented in the*
47 *hearing of the accused by secure phone call*

1 *or perhaps submitted in writing and read to*
2 *the accused.*

3
4 That's what you are referring to, isn't it?

5 A. Not just that, but these procedures are meant for any
6 serious wrongdoing, and my understanding is that they - if
7 someone is actually going through this procedure with
8 respect to sexual abuse, that they receive particular
9 guidance as well, so this is for any serious wrongdoing.

10
11 THE CHAIR: Q. Is that extra guidance included in a
12 document?

13 A. There is the document that was the - I don't know the
14 three names, but the one who provided the information about
15 the legal department at the branch office - that would be
16 the --

17
18 MR STEWART: Q. You mean the witness statement?

19 A. The witness statement, and also there is the letter
20 from 2012, October of 2012, that lays out some of those
21 particular procedures.

22
23 Q. I will go to the letter in a moment.

24
25 THE CHAIR: Q. So are you saying that these procedures
26 have been modified by some other instruction?

27 A. Amended by some other instruction. So the - that
28 would be the letter that comes out that says --

29
30 Q. So the letter says, "Don't follow this procedure;
31 follow a different procedure"?

32 A. It is the same procedure, but helping people
33 understand that if it is a case of sexual abuse, it's not
34 the same thing as someone who transgresses in some other
35 way, and it needs to be handled more sensitively.

36
37 Q. But I'm not sure - are they, nevertheless, in handling
38 it sensitively, to follow these procedures that we're
39 looking at at the moment, or to follow a different
40 procedure?

41 A. It is the same basic procedure.

42
43 Q. So they haven't sat down and looked at this document
44 to see whether it should have a separate section in
45 relation to sexual abuse allegations?

46 A. Well, they have a - they have a section called "Child
47 abuse" in this book, on page 131.

1
2 Q. But here we're looking at judicial hearing procedures.
3 A. Right.
4
5 Q. They haven't sat down and written what the procedure
6 should be in this document for child abuse cases?
7 A. Not as far as I know.
8
9 Q. Many organisations do that these days, don't they?
10 A. Have a --
11
12 Q. How they handle complaints in relation to sexual abuse
13 of children?
14 A. Very few religious organisations have procedures that
15 relate to how they are going to handle the transgressions
16 of individual members of the congregation, the parishioners
17 or the faithful so to speak. There are very few
18 organisations that have procedures for what exactly do you
19 do --
20
21 Q. That's true. But many have procedures to enable them
22 to effectively respond to a complaint that someone has been
23 abused, don't they?
24 A. Yes.
25
26 Q. And in every sense, that's the most important thing
27 the institution can do, isn't it, effectively respond to
28 the person who says they have been abused?
29 A. Yes.
30
31 Q. That should be the priority, shouldn't it?
32 A. Absolutely.
33
34 MR STEWART: Q. Just before I take you to the 1 October
35 2012 letter, you will observe also in paragraph 3 it says:
36
37 *Observers should not be present for moral*
38 *support.*
39
40 Do you see that?
41 A. Yes. This is actually saying that they don't want to
42 hear from a lot of witnesses who are giving character
43 testimony about the accused. So that - I mean, this
44 particular section is really speaking more about moral
45 support for the accused.
46
47 Q. Even if that is so --

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THE CHAIR: Q. I'm sorry, I don't understand that. This is talking about relevant testimony from witnesses. It excludes character evidence, witnesses should not hear the evidence of others, but then it talks about:

Observers should not be present for moral support.

They are different concepts, aren't they?

A. I see, yes.

Q. What Mr Stewart is putting to you is that this would exclude a survivor from having someone there to provide moral support. That's right, isn't it?

A. I'm not sure what happens in each case.

Q. No, no, but that's what these words say, isn't it?

A. Mmm-hmm, it does.

MR STEWART: Q. Then, if we take a look at the document you have referred to, it is at tab 124 - I'm sure we can give you a hard copy. It is the 1 October 2012 letter.

A. Oh, yes, okay.

Q. Is there any part of that letter you would like to identify which moderates or ameliorates or otherwise changes the process we've just been looking at?

A. Sorry, I will just wait until I get a copy of the letter. So I've just been reviewing the letter that is the procedural amendment to the elder handbook, and I remember that we were talking about a topic and I referenced this letter, but then we moved on from that topic and now I don't recall what it was that we were discussing. Do you?

Q. You mean when we referenced this letter?

A. Yes.

Q. It was the procedure of the investigation by two elders interviewing the complainant, going on to the judicial committee, requiring the witness or the complainant or the evidence of the complainant to be given in the face of the accused and no moral support being allowed.

A. So the piece of moral support I don't think is referenced in here. It provides the process of calling the

1 legal department for specific advice under circumstances
2 that range from abuse being alleged by one Witness to
3 happening long ago to the victim now being an adult, and
4 saying that they will give them advice based on the law,
5 and then they will also, then - my understanding is that
6 they will be transferred to the service department and that
7 it is the service department that provides information
8 about caring for the person who may have been abused, and
9 that --

10
11 THE CHAIR: Q. What about the procedure that's referred
12 to in the document that is under the heading "Judicial
13 hearing procedure" - is that modified in any way?

14 A. The only distinction that I would say in terms of
15 procedural is that instead of there being an elder who -
16 like they would decide - here is the - who is going to be
17 on the judicial committee, the circuit overseer is supposed
18 to determine who within the circuit is most qualified to
19 oversee the judicial committee. So rather than just have
20 the elders say, "Oh, we have this, we're going to form our
21 own judicial committee", the circuit overseer is supposed
22 to assign someone to that.

23
24 Q. But the process remains that which is set out --

25 A. That's my understanding.

26
27 Q. -- in the document?

28 A. Yes.

29
30 MR STEWART: Q. That process doesn't meet the best
31 practice elements that you identified in your testimony
32 earlier, does it? It's not child or survivor-centred, is
33 it?

34 A. Well, it can be. I mean, if it is handled
35 sensitively, it certainly can be.

36
37 Q. To require a survivor of sexual abuse to have to
38 disclose the intimate details of what happened to her,
39 which was necessarily of a sexual nature, to, firstly, two
40 men, and then, secondly, to three men, and in the face of
41 her accused - that's in no way child or survivor-centred,
42 is it?

43 A. In the investigation, if the investigation is handled
44 sensitively or the questions are asked sensitively,
45 particularly if it is somebody who the person is
46 comfortable with, it - it could be. It could also be not
47 handled well at all. It's --

1
2 THE CHAIR: Q. Doctor, are you familiar with the work
3 that has been done in Australia in the civil justice
4 process in relation to the prosecution of these types of
5 offences?
6 A. In terms of how survivors are --
7
8 Q. How witnesses are handled and, particularly, how
9 survivors are managed? Are you familiar with those
10 processes?
11 A. I am.
12
13 Q. Are you familiar with one of the fundamentals being
14 that the abused person need not confront the abuser in that
15 scenario?
16 A. Absolutely.
17
18 Q. This process offends against that principle, clearly,
19 doesn't it?
20 A. But my understanding is that they can write a letter
21 and that there doesn't have to be a confrontation at all.
22
23 Q. We just looked at all those processes.
24 A. Yes.
25
26 MR STEWART: Q. I don't know where you get that
27 understanding, whether someone told you that, or what, but
28 you restricted your report and your evidence, now, to what
29 the documents say, and the documents don't say that, do
30 they?
31 A. So you are saying that in the judicial process today,
32 that evidence can't be received from a witness through
33 a letter?
34
35 Q. Well, according to these documents, yes, I am saying
36 that. There may be some judicial committee somewhere --
37
38 THE CHAIR: I think it probably should be put slightly
39 differently.
40
41 Q. The words are "however it may be that the witnesses
42 live a great distance away" - you have to ask yourself what
43 is meant by "witnesses", there, whether that includes the
44 survivor, "or for some reason are not able to be physically
45 present". So we're talking about an exception, do you
46 understand?
47 A. I do.

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Q. Otherwise, the procedure contemplates what Mr Stewart has been putting to you, and that is, that the girl or woman would have to confront ultimately three men in the presence of the abuser and without any moral support. So on her own. Now, is that a good practice?

A. Absolutely not. And I - I want to be clear, if there - if it turns out that the practice that they have today does not allow someone to write a letter and they have to confront their offender and they have to sit in the room with no support, it is not going to meet the standards of care. I didn't understand that that's the process, and there are probably people more qualified than I am to say whether it is, but it wouldn't meet the standard of care if that is the fact.

Q. Well, the difficulty for us is that you have proffered to us your written report in relation to all of this.

A. Yes.

Q. And we're trying to work out whether or not what you have said is something that we, as the Commission, should accept, carrying with it of course the consequence that if we say it is a good practice, then others might follow it. Do you understand?

A. Absolutely. And in no way am I trying to say that that's a good practice.

MR STEWART: Q. There is also this requirement - the two-witness rule. Are you familiar with that? That's actually reconfirmed in paragraph 11 of that 1 October 2012 letter with reference to the scriptures, that the two-witness rule very much applies. That's not best practice, is it?

A. Again, the difficulty is that there are so few organisations that would be dealing with individuals who are part of a congregation. I will say that if we were to look at other religious organisations and ask the question whether, if they went through a process, an internal, ecclesiastical process, and had two witnesses or a confession, and they took that to be true enough to remove someone from ministry, then there are a lot of situations that we wouldn't - that wouldn't have gone any further. So that piece - in an ideal world, we would like for there to be able to be one person saying so. It's difficult in these kinds of situations to sort that out when there is one person and no corroborating evidence.

1
2 THE CHAIR: Q. Doctor, of course I understand how you
3 put it in terms of its context, but the issue in the
4 context of the survivor is that the obligation that
5 a member of the Jehovah's Witnesses has is to report
6 misconduct.
7 A. Yes.
8
9 Q. So that the obligation would fall upon the survivor to
10 report, wouldn't it?
11 A. To report if they had experienced abuse?
12
13 Q. Yes.
14 A. Or if they knew about abuse?
15
16 Q. Yes.
17 A. Yes.
18
19 Q. That would be their obligation.
20 A. You mean within the organisation?
21
22 Q. Yes. And then there is a process that identifies
23 ultimately whether the allegation is accepted or not?
24 A. Mmm-hmm.
25
26 Q. Now, do you see that there may be a problem for
27 a survivor, who has the obligation to report sexual abuse,
28 which very often will happen in private - most often will
29 happen in private --
30 A. Yes.
31
32 Q. -- and find that because there is not another witness,
33 her allegation is not accepted? Do you see that that might
34 have real difficulties for the survivor?
35 A. Absolutely.
36
37 Q. Is it a good process, to allow that mandatory
38 obligation to report to be accompanied by a circumstance
39 where, in many cases, the result will be, because of the
40 absence of another witness, that the allegation is not
41 established?
42 A. It is - there are going to be cases where it goes
43 badly. I think for me, I - because for me, I really
44 believe that religious organisations should be required to
45 report to the law, that's a piece of it that I - that is
46 hard for me to sort that piece out, because there is the
47 ecclesiastical process, and in truth, looking at many, many

1 instances of abuse in religious organisations, there was
2 way more evidence than just two witnesses and way more
3 evidence than just a confession even, and they still didn't
4 act upon it. And so if they follow through with this,
5 probably they are going to act on more cases than I would
6 see in a lot of religious organisations. But the overlay
7 for me is that I would hope that we're going towards also
8 a mandatory reporting requirement, so that they don't have
9 the option to not also report to the police.

10
11 Q. You are right. There will be many religious
12 organisations which don't set out to determine whether or
13 not the allegation is well founded, and the matter will be
14 dealt with by the civil courts. But is there a problem
15 when you do have a process that does set out to identify
16 whether the allegation is well founded, which then can
17 miscarry, as we would conventionally understand it, as this
18 process can? That is the problem, isn't it? You have set
19 out an obligation to report the abuse, then a process to
20 determine the truth, if you like, of that allegation, which
21 I think you and I are on the same ground, we agree does not
22 accord with what one would normally see as the appropriate
23 way to resolve a dispute of that nature, when the
24 allegation is denied; is that right?

25 A. Yes.

26
27 Q. I don't know what we can do about it, but you see
28 there is a real problem?

29 A. It is. And - it is.

30
31 THE CHAIR: I think we might take the luncheon
32 adjournment, Mr Stewart.

33
34 **LUNCHEON ADJOURNMENT**

35
36 MR STEWART: Q. Dr Applewhite, you are familiar, of
37 course, with the possible or potential outcomes from
38 a judicial committee that might have come to a finding of
39 child sexual abuse having occurred being, essentially,
40 a repentance - acceptance of repentance and, therefore,
41 removal from position, maybe removal of privileges, but
42 staying in the congregation; or disfellowship - those are
43 the essential outcomes, aren't they?

44 A. Essentially.

45
46 Q. So if someone in the congregation is found to have
47 committed sexual abuse, and the judicial committee finds

1 them sufficiently repentant, then they remain in the
2 congregation; is that right?
3 A. Yes.
4
5 Q. And if they are not sufficiently repentant, then they
6 will be disfellowshipped, which means they are out of the
7 congregation?
8 A. Yes.
9
10 Q. The repentance, of course, would come with an
11 acceptance that they had done what they were accused of
12 having done?
13 A. Yes.
14
15 Q. If the repentant wrongdoer was a wrongdoer in relation
16 to one of his or her own children, they would go back into
17 the family?
18 A. As far as I understand, yes.
19
20 Q. Unless there was a report to the authorities?
21 A. Well, normally, the - yes.
22
23 Q. And intervention by the authorities. But insofar as
24 the organisation's own steps are concerned, that would be
25 the ordinary course?
26 A. Yes.
27
28 Q. If there was a repentance and then reproof, the
29 reasons for the reproof are not published to the
30 congregation; is that right?
31 A. Yes.
32
33 Q. So the congregation will be left not knowing why this
34 person has been reproofed?
35 A. If no further activity is occurring, that's right.
36
37 Q. Further activity - what do you mean?
38 A. In some cases, if somebody - if they are reproofed for
39 child abuse, then they would be asked to not spend time
40 with children and not be with them in the Kingdom Hall and
41 things of that nature. If they were displaying behaviour
42 that was of that nature, then the procedure would be to
43 warn the families that have children in the congregation.
44
45 Q. Perhaps particular families with which that person has
46 a relationship or engagement; is that right?
47 A. My understanding was that it would be anyone in the

1 congregation that has minor children, but I would have to
2 look at that further.

3
4 Q. That may be subject to us looking at it further. But
5 you accept, and I think you have written or spoken on the
6 subject, that a child abuser, child sexual abuser, is
7 unlikely to be able to stop abusing; in other words, once
8 a child abuser, there is likely to be reoffending - not so?

9 A. It is a very complicated question, but once somebody
10 abuses, once their internal mechanisms of control have
11 allowed them to cross that line once, I don't have
12 confidence in those internal mechanisms of control for the
13 future.

14
15 Q. And so, really, positive steps need to be taken to
16 ensure that such a person doesn't have access or
17 opportunity? Would that be right?

18 A. Yes.

19
20 Q. That ability to take effective child-safe action,
21 given what we just been through, doesn't exist in the
22 Jehovah's Witnesses current procedures, does it?

23 A. Well, I don't think it's just the current procedures -
24 I don't think that they have the authority to remove
25 a child from a home.

26
27 Q. That, certainly. But if the law required them to
28 report, then they say they would report; not so?

29 A. Yes.

30
31 Q. But in the absence of such a requirement, then they
32 are not likely to report, certainly not required by their
33 documents to report to child protection authorities?

34 A. Their documents say if there is a law that we are
35 mandated to report, we report. And that's - I find that
36 true for most religious organisations, that in the absence
37 of a mandated reporter requirement, they often don't report
38 abuse.

39
40 Q. That's, of course, the subject of some other inquiries
41 or case studies within this Royal Commission. Of course,
42 what is required, you agreed earlier, or said earlier, as
43 I understand it, for current best practice is for an
44 organisation to have a strong and effective relationship
45 with child protection authorities?

46 A. Yes.

47

1 Q. And that is absent in this case, isn't it - in the
2 case of the Jehovah's Witnesses?

3 A. I haven't examined particular cases to know whether
4 they are cooperative with authorities or not. My read of
5 their statements and the statement of the witness from the
6 legal department, is that they are instructed to be
7 cooperative with the authorities.
8

9 Q. Where the authorities come forward and require them to
10 do so - not so? I withdraw that. Let's go back and deal
11 with it at a documentary level. There is nothing that
12 requires or even encourages elders to encourage others to
13 report to the authorities - that's right, isn't it?

14 A. What is required is that they are clear that it's the
15 personal decision of the individual whether they are going
16 to report or not. So the word "encouraged" is not used.
17 I like the word "encouraged". That particular word is not
18 used. What they say is that they should never be
19 discouraged and that they should be clear that it is their
20 right to do so and that nobody is going to criticise them
21 if they go to the authorities.
22

23 Q. You would have picked up through your reading of the
24 policies and documents and teaching and so on something of
25 an antipathy to the secular authorities - it's a difficult
26 relationship that the Jehovah's Witnesses have with the
27 secular authorities?

28 A. I haven't picked that up.
29

30 Q. If that was found to be so, then you would accept, of
31 course, that that element of a strong and constructive
32 relationship is absent?

33 A. If it was found that they don't have a strong and
34 constructive relationship, would I accept that they don't
35 have?
36

37 Q. No, if it is found that they have a relationship of
38 antipathy with secular authorities, then that component of
39 the best practice would not be met?

40 A. I would really have to see what it was that was found
41 before I could say. My read of the documents and the way
42 that the director of the legal department has described the
43 procedures and what the elders are instructed to do sounds
44 to me like he is saying "Follow the law and cooperate with
45 the authorities", and even in a case where somebody else
46 reported to the authorities, to cooperate with them and
47 give them documents as required.

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Q. So your opinion on that point is based on what he said in his statement?

A. What he said in his statement and also the other documents that say "We have never discouraged anyone from reporting to the police".

Q. There is no document that says that?

A. "We have never" - there is a letter to the elders that says for many years we have encouraged - we have told the elders to follow the law.

Q. Yes. Well, that's a different point, isn't it. So to the extent to which that opinion is based on Mr Toole's statement as to what takes place, then if those aspects of his statement are not accepted by the Royal Commission, then your opinion would have to be revisited in that respect, wouldn't it?

A. Sure.

Q. I would like to suggest to you that the Jehovah's Witnesses' policies and procedures with regard to raising and responding to child sexual abuse allegations are significantly deficient of current best practice.

A. Currently?

Q. Yes. Do you accept that?

A. That that's your opinion?

Q. No, that that is the position. My opinion is irrelevant. I am suggesting to you that it would be right for this Commission to come to the conclusion, based on the evidence and on what you have had to say, that the Jehovah's Witnesses' current policies and procedures with regard to raising and responding to child sexual abuse allegations are deficient when measured against current best practice?

A. Okay. So when it comes to what they are doing now, I find that much of what they are doing now is consistent with what I see in other religious organisations. If the question is does it meet all current best practices, I would say it probably doesn't. There could easily be ways that many religious organisations could raise the bar and meet better practices.

THE CHAIR: Q. Is it right, though, to compare them with other religious organisations or just what best practice

1 should be, religious, school or anything else?

2 A. I find that the practices in different - for example,
3 the practices in social service organisations tend to move
4 along faster because you have more knowledgeable people who
5 are working in the field, and then you have schools that
6 move along faster, and I find that religious organisations,
7 by and large, move more slowly in developing practices that
8 relate to social services, these particular kinds of social
9 services. So to compare them to, for example, a foster
10 care organisation - I wouldn't normally do that. I don't
11 know what this Commission will do.

12
13 Q. I don't know whether comparison is the right way to go
14 anyway. Isn't the object of all of this for us to try to
15 work out and tell all institutions, whatever, "This is the
16 practice you should follow", not what the best religious
17 practice is, "This is the practice you should follow"?

18 A. I absolutely hope that that's the outcome. I mean,
19 that's what I'm hoping for. And so if we came here five
20 years from now and someone said, "What would you point to
21 the standard of care", I would say "Look at the
22 recommendations that came out of the Royal Commission".
23 I mean, that, to me, is the hope. And that there would be
24 certain practices that would be across the board, no matter
25 who the person is, or no matter what the organisation is,
26 but then certain things that would relate specifically to
27 different types of organisations.

28
29 Q. As we were talking about the issue before lunch, as to
30 the requirements of the judicial hearing procedure, you and
31 I had a discussion about that, you remember, there is
32 a fundamental problem there, isn't there, with the way it's
33 constituted under the current provided procedure?

34 A. The way that what is constituted?

35
36 Q. There's two men, then three men, then the survivor
37 having to tell their story without moral support with the
38 accused present - that process we talked about before lunch
39 and we agreed, I think, that that is not an appropriate
40 process to follow; correct?

41 A. There is - there are better ways.

42
43 Q. Can you help us, from your knowledge of the Jehovah's
44 Witnesses, as I understand it, those procedures are
45 generated in part because of the structure of the
46 organisation?

47 A. Mmm.

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Q. Correct?

A. Yes.

Q. How do they go about solving that problem and responding better to those who allege they have been sexually abused?

A. My understanding is that this practice is happening now, but there will be, I'm sure, other people who can speak to it, but from my perspective, they saw that by allowing a person who wants to come forward to have a support person with them, to speak to an elder and if they would prefer to - I mean, there are some people who want to confront the person who abused them.

Q. There are some who do, but there are many who don't.

A. Absolutely.

Q. And many don't want to be in the same room as the person who assaulted them.

A. Or the same building.

Q. That's right.

A. So, you know, from my perspective, I think the maximum number of choices that you can give to allow the person to speak in the way that is most comfortable for them, everything from where do you meet to who is there to how is the information taken down, so I would say the maximum number of choices. Within their structure, that would look like give them the option to write the letter, allowing someone else to speak who has listened to their testimony, having someone with them if they want to, or not meeting with anybody at all but submitting it in a letter.

Q. As I understand what you are talking about runs into conflict with the Bible as the Jehovah's Witnesses understand it?

A. It may with the piece of having more than one witness.

Q. Well, more than that. Confronting your alleged wrongdoer is another component of it, isn't it?

A. I think that they - I think that they allow the letter to act as the confrontation, that someone is reading it, it is the words of the person and that person is being confronted.

Q. Well, these are things that you think but you can't

1 give us a document that identifies it, can you?
2 A. I believe that in the - I would have to see the
3 statements, but I believe that in the statements that were
4 provided by the director of the legal office and the
5 director of the service desk.

6
7 Q. How do we overcome the problem that your allegation
8 won't be accepted if there isn't another witness?

9 A. That's - from the internal process, you know, that's
10 a piece that is still going to be problematic for someone
11 who doesn't have another witness.

12
13 Q. Which is going to be the case for many sexual assault
14 cases, isn't it?

15 A. Yes, it is.

16
17 Q. How do we deal with that?

18 A. That's a tough one.

19
20 Q. Because for those who have been abused and
21 traumatised, a complaint which they are required to make,
22 which is then not found in their favour, has a potential to
23 further traumatise, doesn't it?

24 A. It is. It is.

25
26 Q. It is by no means an ideal place for someone's
27 psychological wellbeing to be placed, is it?

28 A. That's true.

29
30 MR STEWART: Q. I would like to move on, Dr Applewhite,
31 to the second issue you address - issue 4 as it is termed,
32 on page 7 of your report, which concerns information
33 regarding the systems, policies and procedures in place
34 within the church and the society - that's The Watchtower
35 Society, to prevent child sexual abuse within the church.
36 And as I understand the report, your conclusions on that
37 issue are set out in - and therefore your opinions -
38 paragraphs 45 and 46; is that right?

39 A. Yes.

40
41 Q. And the facts and assumptions on which you base that
42 are set out in the preceding paragraphs, 37 to 44.

43 A. Yes.

44
45 Q. Just identifying the opinion in 45, you say:

46
47 *In my opinion, Jehovah's Witnesses were*

1 *well in advance of other religious*
2 *organisations in providing educational*
3 *materials to parents and families.*

4
5 So I understand by your use of the past tense there, you
6 are referring to the period of the 1980s and 1990s; is that
7 right?

8 A. That's correct.

9
10 Q. You go on to say:

11 *The quality of the materials they provided*
12 *during that period *

13
14
15 in other words, the 1980s and 90s --

16 *... exceeded the standards of care for the*
17 *time and continued to be more substantial*
18 *than what many religious organisation offer*
19 *parents and guardians today.*

20
21
22 So insofar as the quality of the materials provided by the
23 Jehovah's Witnesses are concerned, you have set out in the
24 preceding paragraphs what you rely on, and that's well
25 understood, but of course, insofar as the standards of care
26 for the time are concerned, in other organisations, we
27 can't see what you base that on?

28 A. Right. And I revert back to the same problem that we
29 had before, which was that I haven't laid out, for example,
30 when was the first time that another or 10 other religious
31 organisations first provided information to parents and
32 families. I haven't set that out here.

33
34 Q. And what the quality of their material was?

35 A. That's right. Well, there was very little of it, but
36 that's right.

37
38 Q. Then also there is the component of it, of that
39 sentence, that the quality of the materials provided by the
40 Jehovah's Witnesses continued to be more substantial than
41 what many religious organisations offer parents and
42 guardians today. That suffers from the same difficulty for
43 us. Do you see that?

44 A. I do. I do.

45
46 Q. Of course, by saying "many religious organisations",
47 that leaves us not knowing whether that is

1 proportionately - proportionately how many, many could
2 still be a very small proportion?

3 A. Sure.

4
5 Q. One doesn't really know where you see the Jehovah's
6 Witnesses standing relative to current practices of
7 provision of materials?

8 A. Yes. And providing directly to parents and guardians
9 information about sexual abuse, what to watch for, how to
10 respond if their child discloses. That has been something
11 that has developed in the post-2000 time frame, but
12 I haven't provided you with information about, for example,
13 the first year that those were provided in various
14 religious organisations.

15
16 Q. Then in paragraph 46 you say:

17
18 *Since 2002, extensive programs of sexual*
19 *abuse prevention have been initiated by*
20 *other religious organisations and the*
21 *standards of care in this respect have*
22 *developed significantly over the past*
23 *decade. However, most of the efforts of*
24 *these religious organisations have*
25 *naturally focussed on prevention within*
26 *their own programming for children and*
27 *youths.*

28
29 Then you say, which is what I'm really getting to:

30
31 *In my own experience, I have not found*
32 *examples in Australia of religious*
33 *organisations that have provided parents,*
34 *guardians and the general public with the*
35 *quality or consistency of information about*
36 *prevention and response to sexual abuse or*
37 *about how to support for those who have*
38 *been abused that Jehovah's Witnesses have*
39 *provided in their publications.*

40
41 But of course your experience in Australia is limited to
42 those various Catholic organisations you identified earlier
43 and some other participants of those educative programs; is
44 that right?

45 A. I've - when you say "some other participants", they
46 would be from religious organisations and social service
47 organisations.

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Q. Participants in educative programs run by you?

A. Yes, but I have had contact beyond having an educational program where I've asked to review materials. I try to keep up with what are current policies in various religious organisations and other organisations that serve children. So I have asked for those materials and received them and reviewed them.

Q. You wouldn't be making the claim that you have kept up with materials that are provided by organisations directly to their members or to families, to parents and families?

A. So what I would ask for is any educational programs that they are using and what those materials would be, and that would include things for their staff, for their volunteers, things for their clergy, things for foster parents, and also parents and children.

Q. Specifically, can you identify which organisations?

A. That I've asked for those materials?

Q. Asked, received and reviewed?

A. I can't. I would have to go back to emails and correspondence and things of that nature to identify those organisations.

Q. I will come to the other opinions in a moment, perhaps. Just on this question of the clarity of the message and undoubtedly some of these articles do have very clear messages or to some degree, but there are one or two aspects I would like to bring to your attention. I want to show you an article which was published in Awake! on 22 June 1982, and it is titled "To End Child Abuse" I will have copied distributed to you and others in a moment. While that is being located, we can look at one of the others which is in the bundle, at tab 82. You refer to this, in fact, in your paragraph 42(b). If we can look at tab 82 on the screen. This is a collection of a number of articles which you identify and refer to, and there is a lot of information provided there. There is just one aspect in particular that I want to ask you about. If you go to page 13, which is the second from the end, you will see there is this bit at the end under the heading "The End of Abuse ", and in particular, from the foot of the left-hand column, it says:

Jehovah God promises a time when all such

1 *treacherous people will be 'torn away from*
2 *the earth,' and only the meek and gentle*
3 *who love God and fellowman will be allowed*
4 *to remain. We have that marvellous hope of*
5 *a new world thanks to the random sacrifice*
6 *of Jesus Christ. Then, and only then, will*
7 *abuse end forever.*

8
9 *In the meantime, we must do all we can to*
10 *protect our children.*

11
12 And then it goes on. I am wondering what meaning you would
13 expect a parent reading that to get from that? How is that
14 to be understood by an ordinary parishioner or publisher
15 reading that?

16 A. I don't think I'm qualified to answer that question as
17 to what that particular phrase or the particular lines that
18 you read would necessarily mean to somebody who was
19 a publisher.

20
21 Q. Perhaps if you can look at the other article that
22 I have got for you. It is really quite similar to the 1982
23 one. If we can look on the second page, you will see
24 halfway down the second column is I think much the same.

25 A. I only got one page - oh, here it is, it is on the
26 back.

27
28 Q. You see halfway down the second column:

29
30 *Only the Bible' solution will end the abuse*
31 *of children. Jesus summed it up: 'Love God*
32 *with your whole heart. Love your neighbour*
33 *as yourself.' The apostle Paul repeated*
34 *it: 'Love does not work evil to one's*
35 *neighbour; therefore, love is the law's*
36 *fulfilment.'*

37
38 *This solution of brotherly love is*
39 *practical. When applied, it works. Too*
40 *many are hearers of God's word but not*
41 *doers of it. Too many say 'Lord, Lord,'*
42 *but don't listen to Jesus or do Jehovah's*
43 *will.*

44
45 *In God's due time all who embrace his*
46 *kingdom under Christ will become able to*
47 *keep this law of love perfectly. Then will*

1 *come fulfilment of Proverbs 2:21,22: 'The*
2 *upright are the ones that will reside in*
3 *the earth, and the blameless are the ones*
4 *that will be left over in it. As regards*
5 *the wicked, they will be cut off from the*
6 *very earth; and as for the treacherous*
7 *they'll be torn away from it.'*

8
9 *This is the only way, the final way, to end*
10 *child abuse.*

11
12 A parent who may be interested or concerned about child
13 abuse - how do you suppose they would understand that to
14 apply in their lives?

15 A. I think you would have to ask a publisher. I think
16 you would have to ask a member of the congregation exactly
17 how they would respond to that.

18
19 Q. My only suggestion is that whilst some of the messages
20 are very clear, and I accept that entirely, there are other
21 messages, it seems to me and I suggest to you, that are
22 quite unclear.

23 A. Again, I mean, what is unclear to me as a person who
24 hasn't studied this in this way - I am not sure that I'm
25 the one to answer it.

26
27 Q. Have you given any consideration to the effect that
28 these articles have in the context of being in amongst
29 a lot of other information and articles being published and
30 given to publishers?

31 A. Could you be more specific?

32
33 Q. Have you given any consideration to the effect that
34 these articles have in the context of being amongst a lot
35 of other information and articles that are being made
36 available or published to members of the congregation? In
37 other words, you have looked at the articles and what they
38 say. Have you looked beyond that? Are they being read,
39 how are they being understood in the context of a lot of
40 other information?

41 A. Well, there is a general practice of everyone reading,
42 so it's not just printed and put on a shelf; people read
43 them together and discuss them together. What has happened
44 is that many times throughout the years, particular
45 articles that speak to the issues of sexual abuse and talk
46 about the experience of someone who has been abused have
47 been referred back to in letters to congregations or

1 referred back to in certain teaching moments. So those
2 would be brought back up.

3

4 Q. These are principally published in the Awake! and
5 Watchtower magazines; is that right?

6 A. Principally, yes.

7

8 Q. Are you aware how many editions of each of those there
9 are each year?

10 A. I have seen it written, but - four times a year, or -
11 I'm not sure. I think they are published at different
12 times but I'm not sure. But there are multiple issues
13 a year.

14

15 Q. And multiple articles per issue?

16 A. Yes.

17

18 Q. So it may be that these child sexual abuse articles
19 get relatively swamped by other information that has been
20 provided?

21 A. I can't answer that. I just don't know.

22

23 Q. You see, in your conclusion at paragraph 49, right at
24 the end, you say:

25

26 *Jehovah's Witnesses excel in providing such*
27 *educational materials to parents and family*
28 *members, and the substance of their*
29 *materials concerning child abuse is*
30 *exceptionally clear and helpful.*

31

32 I suppose what I am taking exception with is your use of
33 the word "exceptionally", and I would suggest that it might
34 be qualified in the way in which I have put to you?

35 A. So what I would be referring to there is, for example,
36 an article that says, "If your child experiences abuse, be
37 sure that you don't just say to them one time 'it's not
38 your fault', that you may have to come back and have
39 another conversation with the child and let them know that
40 you really believe that more than once", and when I say
41 "exceptional", as far as distribution, it would be very -
42 the infrastructure for getting this kind of material to be
43 read and reviewed by individuals in a congregation of any
44 religious organisation - it's just unusual to have the
45 infrastructure available for the printed material to be
46 there and everyone to review it and to have a discussion.

47

1 In my experience with parents and voluntary - for
2 example, a school, saying "We're going to have an
3 educational evening and parents can come and learn about
4 sexual abuse", a lot of preparation can go into that and an
5 awful lot of people don't show up, so you can have a big
6 forum and let people know that you are there and have five
7 people show up. So it's terribly difficult topic for
8 people. And so to actually get the educational materials
9 out there and to family, they just have a unique
10 infrastructure available for that.

11
12 Q. But you're not saying that it is your experience that
13 each article is discussed in a structured way. It is the
14 case, isn't it, that some articles are chosen for
15 particular study but others are there just for people to
16 read when and if they want to?

17 A. There is a structure to reviewing every Watchtower
18 that comes out. So, you know, that's a piece that - there
19 is Watchtower study, so they would go over those. Awake!
20 Magazine is not as formal, but people read those articles
21 and often sit down with people and will go over those
22 articles in Bible study time and things of that nature. So
23 it's a more structured process than just mailing it to
24 people's house and hoping that they read it.

25
26 Q. How do you know about the sitting down and discussing
27 it - where do you have that knowledge from?

28 A. There are letters that are sent that say, "Review" -
29 for example, to all congregations, "This is a 15-minute
30 talk and you need to review this article and you need to
31 ask these questions". So within their materials where they
32 talk about the structure of meetings and what is going to
33 happen at individual meetings, you will find that kind of
34 structure.

35
36 Q. But that's my point, that's in respect of certain
37 select articles, but not everything, isn't it?

38 A. Not everything that they publish would have someone up
39 there teaching and going over that, that's true.

40
41 Q. Or a structured response to reading it, dealing with
42 it, studying it?

43 A. Not everyone, but in particular, the articles that
44 were published in 1985 in the whole magazine that was
45 devoted to child sexual abuse in 1985, that one has had
46 times when there would be a letter that goes out that says
47 "Review these articles".

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Q. Dealing with the question of prevention of abuse and the circumstances in which it occurs, I take it that you are familiar, at least to some degree, with the work of David Finkelhor?

A. Yes.

Q. He is a leading researcher and academic and writer in the field, isn't he?

A. Yes, he is.

Q. I think you mention in your report at paragraph 43(a), saying that it's a good thing that his name was picked up in one of the articles published by the Jehovah's Witnesses - not so?

A. I just wanted to illustrate the fact that there are solid researchers that are cited in the articles.

Q. Solid and credible?

A. And credible.

Q. Are you familiar with the Australian Institute for Family Studies report published last month, June 2015 --

A. Was it on education for children?

Q. "Conceptualising the prevention of child sexual abuse"?

A. I've seen it but I don't recall the contents of it right now.

Q. I am going to give you a copy.

A. Thank you.

Q. Particularly, I am interested in chapter A5 of that report which starts at page 30. You will see it deals with theories on how and why child sexual abuse occurs. You can scroll down. It says:

There are various psychological and criminological theories.

And so on. Then in the second paragraph:

This section describes thee key etiological theories used to explain why child sexual abuse occurs -

1 And the first one is Finkelhor's Four Preconditions Model.
2 Do you see that?

3 A. Yes.

4
5 Q. Are you familiar with that model?

6 A. Yes, that has been around for a long time.

7
8 Q. Finkelhor published that in 1984, but it is still
9 regarded as a key theory about the causation or, as it is
10 put here, etiological theory to explain why child sexual
11 abuse occurs?

12 A. Yes.

13
14 Q. It is not discredited?

15 A. Not to my knowledge.

16
17 Q. You will see, if we scroll down further, it says that
18 Finkelhor's model:

19
20 *... has been widely used for understanding*
21 *child sexual abuse offenders. It was the*
22 *first to move beyond the notion that child*
23 *sexual abuse only occurs as father-daughter*
24 *incest or when men who are strangers molest*
25 *a multitude of children.*

26
27 The four preconditions are identified there in bullet
28 points: firstly, "motivation to sexually abuse", secondly,
29 "overcoming internal inhibitors", thirdly, "overcoming
30 external inhibitors" and finally, "overcoming the
31 resistance of the child".

32
33 *According to this theory, all these*
34 *preconditions need to be met in order for*
35 *child sexual abuse perpetration to be*
36 *possible and to occur.*

37
38 The model takes it a step further and if we look over the
39 page, in the third paragraph, it says:

40
41 *Finkelhor (1984) noted that these*
42 *preconditions ...*

43
44 In other words, those four necessary preconditions all of
45 which have to exist:

46
47 *... not only operate on an individual level*

1 *but on a more sociological level. Social*
2 *factors and characteristics can act as*
3 *motivators or inhibitors to child sexual*
4 *abuse perpetration.*

5
6 And then table A4 outlines how the preconditions work in
7 relation to individual and social/cultural factors.

8 A. Mmm-hmm.

9
10 Q. You will see down the left-hand side are the four
11 preconditions, in the first column that I read out earlier,
12 and then adjacent to each of them in the subsequent columns
13 is, firstly, the individual factors, and there is a list of
14 them, and then the social/cultural factors in the
15 right-hand column; do you see that?

16 A. Yes.

17
18 Q. So, looking at the social/cultural factors, I want to
19 identify some which I suggest exist within the Jehovah's
20 Witness organisation and get your response to that. So
21 firstly, in other words, in the first row that is adjacent
22 to the precondition of motivation to sexually abuse, one of
23 the factors, social/cultural factors is:

24
25 *Repressive norms about masturbation and*
26 *extra marital sex.*

27
28 Now, you would agree that that is a factor existing within
29 the Jehovah's Witness community?

30 A. Well - so - yes.

31
32 Q. And then in the second line, in other words, adjacent
33 to "overcoming internal inhibitors" as the precondition,
34 you will see that the second social cultural factor is:

35
36 *Weak criminal sanctions against offenders.*

37
38 Now, in an environment where - and I will ask you to
39 assume - that reporting to authorities is only done where
40 the law requires, and within the Jehovah's Witnesses there
41 are weak criminal sanctions against offenders.

42 A. Well, I have told you my position as far as having,
43 you know - that I really believe that the criminal
44 sanctions are necessary. Any time someone can behave in a
45 certain way and not have consequences for their behaviour,
46 then they are not less likely to desist the behaviour, so
47 we always want there to be clear consequences for the

1 behaviour that can act as a deterrent.

2

3 Q. Do you accept that the process of investigation and so
4 on that we have been through before, and the way in which
5 child sexual abuse allegations are dealt with within the
6 Jehovah's Witness community by the elders and so on, would
7 generally delay any report being made to the authorities?

8 A. I would have to look at a case to determine that, if
9 it happened in a certain case, but, you know, from my
10 perspective, if they are mandated to report, and they
11 report, then their own investigation should be set aside
12 while the criminal justice system does their work.

13

14 Q. Well, you should know in Australia - perhaps you do
15 know this that the current position is it's only in
16 New South Wales and Victoria that there are crimes for not
17 reporting?

18 A. Yes.

19

20 Q. And there is no mandatory reporting to child
21 protection authorities applicable in this context because
22 they aren't teachers or other designated professions.

23 A. Right.

24

25 Q. So essentially, and for the most part, absence of
26 criminal sanction if you don't report or mandatory
27 reporting requirements, if people see within their
28 community a system that is supposed to and tries to deal
29 with these issues, that is going to delay any attempt to
30 report outside and ensure that the authorities can deal
31 with it?

32 A. Which is why I would advocate for those laws to be
33 changed.

34

35 Q. The third social/cultural factor, the one immediately
36 beneath "weak criminal sanctions" is "ideology of
37 patriarchal prerogatives for fathers". That's of course
38 true in the Jehovah's Witnesses, isn't it?

39 A. I would have to read a little bit more about what they
40 mean by "patriarchal prerogatives for fathers", but it's
41 possible that that's consistent. But I would just have to
42 read a little bit more of the background of what they are
43 referring to. For example, the one you mentioned before -
44 I've read some of that research and really they are talking
45 about in the absence of another sexual partner, that
46 a person would be more likely to abuse a child, and so
47 these are - there's some more to each one of these than can

1 just be read in one line.
2
3 Q. I accept that. Of course, it is a patriarchal
4 organisation?
5 A. It is.
6
7 Q. In the third row, adjacent to the "precondition of
8 overcoming external inhibitors", insofar as social/cultural
9 factors are concerned, there are certainly barriers to
10 women's equality - you would agree?
11 A. Yes.
12
13 Q. And there is strong ideology of family sanctity; you
14 would agree?
15 A. Yes, I just don't know what that - I don't know how
16 that relates - oh, I - so is this generally speaking?
17 I just haven't come back, but when they are applying the
18 model to these cultural factors, are they generally
19 speaking about incest-type offending?
20
21 Q. No. No, it's not. It is certainly not limited to
22 that, because Finkelhor --
23 A. I know Finkelhor wasn't referring to it, I'm talking
24 about this application of it.
25
26 Q. This isn't the application; this is a tabular form of
27 the model.
28 A. Yes. I would have to look at that a little bit more,
29 because for organisational-type abuse or abuse that happens
30 in organisations, that particular piece of it wouldn't be
31 as related to institutional type of abuse, but that would
32 be related to incest-type abuse.
33
34 Q. Yes, yes, but if you have a situation where what goes
35 on in the family is very much the subject of the church,
36 including the church's disciplinary processes, and the
37 church has a strong ideology of family sanctity, then this
38 would be regarded - you would see this as being met,
39 wouldn't you?
40 A. According to this, yes.
41
42 Q. And what about the one immediately above that,
43 "Erosion of social networks", insofar as instructions about
44 not associating with worldly people are concerned?
45 A. You might see it that way.
46
47 Q. And then in the last row "Overcoming the resistance of

1 the child", a social cultural factor of "Social
2 powerlessness of children" - do you accept that within the
3 Jehovah's Witness Church?

4 A. It's not a - it's not a factor that I've looked at
5 carefully. I would say that they have been encouraged to
6 talk with their children about sexual matters and that
7 those lines of communication would probably be a helpful
8 factor. The social powerlessness, I'm just not sure about.
9

10 Q. This model would certainly raise for you some flashing
11 lights about the social/cultural environment of the
12 Jehovah's Witness Church insofar as child sexual abuse is
13 concerned, wouldn't it?

14 A. Tell me what you mean by "flashing lights".
15

16 Q. These factors come together really in a perfect storm
17 for the Jehovah's Witnesses in the risk of child sexual
18 abuse occurring there.

19 A. I think I would have to look at this more carefully to
20 be able to say that. I just would have to look more
21 carefully.
22

23 MR STEWART: Those are my questions, your Honour.
24

25 THE CHAIR: I think we should mark the document "To end
26 child abuse". I will make it exhibit 29-014, and the
27 document "Conceptualising the prevention of child sexual
28 abuse we will mark 29-015.
29

30 **EXHIBIT #29-014 DOCUMENT "TO END CHILD ABUSE"**
31

32 **EXHIBIT #29-015 DOCUMENT "CONCEPTUALISING THE PREVENTION OF**
33 **CHILD SEXUAL ABUSE"**
34

35 THE CHAIR: Q. Just to finish the discussion you and
36 I had previously, doctor, if a woman brings an allegation
37 that she has been sexually assaulted by a member of the
38 Jehovah's Witness, and she does so because of her strong
39 adherence to the tenets of the church, and believes that
40 she has to report, but she doesn't want to go to the
41 authorities, she doesn't want to be involved in a criminal
42 trial, and there is no other witness, and the alleged
43 abuser doesn't confess, but those listening to her story
44 don't have any doubt that she is telling the truth, but
45 they can't take any action because there is only her
46 evidence, what happens, then, within the church?
47 I assume - well, you tell me, does the abuser then stay

1 with all of his rights intact and the woman would be
2 required to, if she wished to remain part of the Jehovah's
3 Witnesses, interact with him in that environment? Is that
4 what happens?

5 A. In addition to some other warnings or things of that
6 nature, I would think that that would be what would happen.

7
8 Q. It is not a very good place to end up, is it?

9 A. It isn't.

10
11 THE CHAIR: Does anyone else have any questions?

12
13 MR TOKLEY: Yes, please, your Honour.

14
15 THE CHAIR: Anyone else?

16
17 MR COYNE: No.

18
19 MS DAVID: No.

20
21 **<EXAMINATION BY MR TOKLEY:**

22
23 MR TOKLEY: Q. Dr Applewhite, as you know, my name is
24 Andrew Tokley. I represent the Watchtower Bible & Tract
25 Society of Australia and I also represent three persons who
26 have been called to give evidence before the Commissioner.
27 Dr Applewhite, I wish to ask you some questions about your
28 report, if I may, if you could have that before you.

29 A. Pardon me, I don't want to interrupt you, but would it
30 be possible to take a short break before we finish up?

31
32 THE CHAIR: Q. Do you want to take a break now?

33 A. Would that be possible? Is that all right.

34
35 Q. Yes, we will take a short break. Let me know when you
36 are ready.

37
38 **SHORT ADJOURNMENT**

39
40 MR TOKLEY: Q. Dr Applewhite, could I please ask you to
41 go to paragraph 2 of your report.

42 A. Yes.

43
44 Q. My learned friend, counsel assisting the Commission
45 took you to the formal qualifications you have, which
46 include a bachelor's degree in social work, a masters
47 degree, and also a Doctor of Philosophy in clinical social

1 work, but I don't think he mentioned that you have some 22
2 years of experience in dealing with the matters you refer
3 to there - that is, conducting root cause analysis of such
4 cases?

5 A. Yes.

6
7 Q. And for the purposes of this report, or your
8 statement, you have relied upon your experience of the past
9 22 years in forming your opinions?

10 A. That's correct.

11
12 THE CHAIR: I'm sorry, I'm not quite sure I'm
13 understanding. I had thought your recent work was more
14 educational.

15 A. I can - my recent work is in education, but I continue
16 to conduct root cause analysis of cases and consult with
17 organisations that have particular cases as well.

18
19 Q. And the 22 years - sorry, the extensive experience
20 working directly with sexual offenders --

21 A. Yes.

22
23 Q. -- when was that?

24 A. That was - well, I began working with sexual offenders
25 in the Catholic Church in 1992 and I have worked with
26 various organisations that have sexual offenders that are
27 still members of the church or still are part of an
28 organisation, as well as organisations that serve
29 juveniles, minors, who have also sexually offended and
30 working with them to develop supervision plans for
31 residential treatment programs.

32
33 Q. So what is your direct work with sexual offenders?

34 A. That would be going into the environment where they
35 are living, interviewing them and working out supervision
36 plans, as well as during times when I've been asked to do
37 an investigation for an organisation that has already -
38 they have been through the criminal justice system, but the
39 organisation wants to do a root cause analysis. In that
40 case, I would interview the sexual offender, which is not
41 the same thing as being a therapist for the sexual
42 offender. I have never worked as a therapist for sexual
43 offenders but I have worked doing supervision plans as well
44 as doing follow-up with them to determine how it was that
45 they selected particular organisations or particular
46 victims.

47

1 MR TOKLEY: Q. Dr Applewhite, my learned friend
2 Mr Stewart asked you some questions about paragraph 10 of
3 your statement. In particular, he asked you some questions
4 about the last sentence in paragraph 10. Do you recall
5 those questions?

6 A. I recall.

7

8 Q. Can I ask you, please, did the last sentence in
9 paragraph 10 in any way inform the opinion that you have
10 expressed in paragraph 36 of your opinion, your report?

11 A. No, I was offering that as information about the
12 organisation under the title "Background information".

13

14 Q. You were also asked some questions about paragraph 20
15 and, in particular, the second sentence in paragraph 20,
16 that ministerial servants are not authorised to provide
17 spiritual guidance, counselling or any other pastoral
18 services to members of the congregation. Do you recall
19 those questions?

20 A. I do.

21

22 Q. Did the second sentence in paragraph 20 - was that the
23 basis of any opinion you expressed in paragraph 36?

24 A. No.

25

26 Q. As his Honour has raised with you, one of the
27 difficulties that has been experienced, and this is no
28 fault of your own and no criticism of you, but the opinion
29 expressed in paragraph 36 is a compendious opinion,
30 obviously based upon what you have read and your
31 experience. Would it be of assistance to you if you were
32 able to provide a more fulsome, perhaps supplementary
33 report expressing the reasons and setting out the
34 documentation that you relied upon in coming to the
35 conclusion in paragraph 36?

36 A. It's a small research project, and so I haven't had an
37 opportunity to do that, where I laid out the years and the
38 different organisations and the practices that are in
39 place. If it was helpful to the court, then I could do
40 that.

41

42 Q. So if his Honour were to give permission for you to
43 provide a supplementary opinion, you would be prepared to
44 undertake the task of setting out in a more fulsome way the
45 reasons you have for reaching that opinion?

46 A. If I were asked to, yes.

47

1 THE CHAIR: Mr Tokley, I can appreciate why you ask the
2 question, but the issue for us at the end of the day is not
3 who is best.

4

5 MR TOKLEY: Understood, your Honour.

6

7 THE CHAIR: What we have agreed, I think, is that there
8 are some problems with the current structure of the
9 processes. That's clear.

10

11 Q. Am I right?

12 A. Yes.

13

14 THE CHAIR:

15 Q. We have agreed that.

16

17 Now, I don't know of any other religious organisation
18 which, which is how this is framed, which has the processes
19 with the flaws that we have identified in the Jehovah's
20 Witnesses. They may have other flaws - indeed, we have
21 published some reports about other religious organisations
22 already. So certainly if you wish the doctor to do that
23 work, that's appropriate.

24

25 MR TOKLEY: Thank you, your Honour.

26

27 THE CHAIR: But I have to warn you, at the end of the day
28 the question is not who wins the competition, and what will
29 remain, as I understand at the moment, are the flaws in
30 your client's current processes.

31

32 MR TOKLEY: That's understood, your Honour, but
33 Dr Applewhite is here to assist the Commission. As
34 Dr Applewhite has said, she is not an advocate for any
35 party, and we consider that it would be, if it is of
36 assistance to the Commission, it should be offered to the
37 Commission.

38

39 THE CHAIR: What would be of greatest assistance is not an
40 expression of opinion as to who is best and who is worst,
41 but an expression of opinion as to what are the good things
42 and what are the bad things, both in the Jehovah's
43 Witnesses and in any else's processes, you understand?

44

45 MR TOKLEY: I do, and that can certainly be taken on, and
46 if your Honour would be so good as to allow Dr Applewhite
47 the opportunity to present a supplementary report, that can

1 be addressed. I'm sure Dr Applewhite would be prepared to
2 make herself available for any further questions that the
3 Commission may have of her.

4
5 THE CHAIR: We would have to have that opportunity if that
6 was required - it could, of course, be done by video-link.
7 And we would need to have a time frame, a fairly short time
8 frame, on the doing of any work, because we have so many
9 things to do that we just can't let things drift.

10
11 MR TOKLEY: Understood, your Honour.

12
13 THE CHAIR: I'm talking a matter of a minimum number of
14 weeks.

15
16 MR TOKLEY: Subject to Dr Applewhite's availability and
17 work commitments, I am sure if Dr Applewhite could assist
18 the Commission, she would.

19
20 THE WITNESS: That's true.

21
22 THE CHAIR: Again, I stress, work that leads to the
23 winning or losing of a competition is not going to help us.

24
25 MR TOKLEY: No, understood, your Honour. At the same
26 time, I think that what has fallen from your Honour in
27 terms of the good and the bad - there is no point in
28 throwing out the good with the bad. So what is good should
29 be kept.

30
31 THE CHAIR: No, but ultimately what I'm going to look you
32 to help me and the Commissioner with is if there is bad,
33 what is going to be done about it.

34
35 MR TOKLEY: I think some of the questions I will ask
36 certainly may assist your Honour in that regard.
37 Certainly, that's what, if I can put it this way, we're
38 here for, to demonstrate that, amongst other things, the
39 policies, practices and procedures of the Jehovah's
40 Witnesses, like all other organisations, evolve over time,
41 and that the present policies, practices and procedures are
42 not those that existed some 25 years ago.

43
44 THE CHAIR: Are they what is presently contained in the
45 document "Judicial hearing procedure"?

46
47 MR TOKLEY: Your Honour, the procedure - that's why I use

1 the expression "policies, practices and procedures" - the
2 procedures are set out in the Elders' Handbook KS 10, but
3 the handbook is supplemented by the letters of instructions
4 given to the elders, but it's also supplemented by the
5 advice provided by the service department, and your Honour
6 will hear from Mr Spinks of the service department as to
7 how matters are handled by the service department. So that
8 the precise and sensitive way in which matters are dealt
9 with will depend upon each individual case that comes
10 before the service department.

11
12 THE CHAIR: Are you saying to me that the document we
13 have, which is the judicial hearing procedure in the
14 Shepherding of the Flock document, is not, in fact, always
15 followed?

16
17 MR TOKLEY: Your Honour, it is a matter of submission, but
18 there is, within the procedure, scope for adaptation of the
19 procedure to the individual circumstance.

20
21 THE CHAIR: You will have to take us to that, but could
22 you answer my question?

23
24 MR TOKLEY: Yes.

25
26 THE CHAIR: Is it always followed?

27
28 MR TOKLEY: No, your Honour, it is not always followed.
29 Your Honour will have heard that the procedure is for
30 judicial cases generally, but it is adapted to specific
31 child abuse - adapted specifically to child abuse cases.
32 So, for example, as Dr Applewhite said earlier, if a child
33 would not wish to appear before the judicial committee, it
34 would could be adapted to allow the child - when I say
35 child, a person under 18 - to provide a written statement
36 about the circumstances, and your Honour will hear from
37 Mr Spinks about cases where that has occurred.

38
39 THE CHAIR: What about an adult who was abused as a child?
40 You see, the courts have dealt with that issue, at least in
41 this State and in some other States - I'm not sure about in
42 America. It's a really serious issue.

43
44 MR TOKLEY: Understood, your Honour, and we have seen from
45 your Honour's questions what your Honour is most concerned
46 with, and that will certainly be addressed.

47

1 THE CHAIR: Well, ultimately - you can take this back to
2 your client, obviously - but if the procedure is not
3 followed, it would be a very good idea to write out what
4 the procedure actually is and include it in the document.
5 I mean, that's the starting point.

6
7 MR TOKLEY: Yes, your Honour.

8
9 THE CHAIR: But the other problem, which I know is
10 a serious problem, is what happens in the event that there
11 is only the one person to give evidence - that is, the
12 survivor. That's another really serious problem, because
13 if you put mandatory obligation to inform, together with
14 incapacity to accept if the survivor is the only witness,
15 you have a potential to create really serious trauma for
16 that person.

17
18 MR TOKLEY: Understood, your Honour.

19
20 THE CHAIR: We will have to address it and your client
21 will have to as well.

22
23 MR TOKLEY: Yes, that's understood. As your Honour knows,
24 because your Honour was here, this week we have heard
25 understandably and of course first from the victims
26 themselves and then those persons who handled the matter,
27 in both cases approximately 25 years ago. As I said
28 earlier, matters have evolved over time. Your Honour will
29 hear next week from those who now address such matters
30 directly, and your Honour will hear how the practices and
31 procedures have evolved, how they are now case sensitive to
32 the individual persons concerned.

33
34 THE CHAIR: We look forward to that. But we will also
35 look forward to you telling us what is going to be done
36 about the documentation -

37
38 MR TOKLEY: Yes, your Honour.

39
40 THE CHAIR: - that records what should happen. Let's
41 leave it at that at this stage, but there is a lot of work
42 to be done.

43
44 MR TOKLEY: Understood, your Honour.

45
46 Q. I think I was on paragraph 20. What I was asking you,
47 Dr Applewhite, was whether the second sentence of

1 paragraph 20 informed the opinion that you expressed in
2 paragraph 36.

3 A. We got a little bit past that. I had said no, it was
4 a piece of background information.

5
6 Q. Beginning at paragraph 22 of your statement, you deal
7 with the matters you did rely upon, as I understand it, for
8 the purposes of reaching your opinion. You specifically
9 set out some of those matters, including, for example, at
10 paragraph 26, how child sexual abuse is regarded as a crime
11 by Jehovah's Witnesses. You have also quoted in
12 paragraph 26 the passage from the Elders' Handbook,
13 Shepherd the Flock of God, and I think you were asked some
14 questions by my learned friend Mr Stewart about whether the
15 Jehovah's Witnesses were encouraged to report matters, and
16 in the paragraph that you quote in paragraph 26 of your
17 report, it is stated, is it not, that child abuse is
18 a crime:

19
20 *Never suggest to anyone that they should*
21 *not report an allegation of child abuse to*
22 *the police or other authorities. If you*
23 *are asked, make it clear that whether to*
24 *report the matter to authorities or not is*
25 *a personal decision for each individual to*
26 *make and that there are no congregation*
27 *sanctions for either decision. Elders will*
28 *not criticise anyone who reports such an*
29 *allegation to the authorities. If the*
30 *victim wishes to make a report, it is his*
31 *or her absolute right to do so.*

32
33 Is it your understanding that the approach taken by the
34 Jehovah's Witnesses is that it is the right of the
35 individual, the right of the victim, whether to report the
36 matter or not?

37 A. Yes, as well as to report themselves if they are
38 required by law to do so.

39
40 Q. Is it also your understanding that it is not the right
41 of another person to deny to the victim the right they have
42 to report?

43 A. That's my understanding.

44
45 Q. Could I ask you please to go to paragraph 43 of your
46 report.

47 A. Yes.

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Q. In paragraph 43 you have set out in a number of subparagraphs some of the articles that the Jehovah's Witnesses have published over time concerning child molestation; that is correct?

A. This wouldn't be over time. This was - this particular paragraph and the subparagraphs are referring to --

Q. The particular magazine?

A. A particular publication that contained multiple articles.

Q. And that was published on 22 January 1985?

A. That's correct.

Q. Based on your work and experience with other religious organisations, and taking on board the point that his Honour makes, that it is not necessarily just a comparative exercise, but based on your knowledge and experience of other religious organisations, do you know of any other religious organisation that published as early as 1985 several articles dealing with child molestation?

A. There are writings that other religious organisations have produced, but not for parents and families, not to be published for all members of the community.

Q. I think you gave evidence to the effect that the Awake! Magazine is discussed by the congregation - articles in the Awake! Magazine are discussed by the congregation?

A. Yes, and the Awake! Magazine is one of the publications that is used when meeting with people in door-to-door ministry. So it would be a magazine that people are more familiar with from that perspective as well.

Q. At paragraph 45, you express an opinion which my learned friend took you to. Again, would it be of assistance to you to be able to expand upon paragraph 45 so that the Commission may understand the materials that you were there referring to?

A. I don't think whether it is of assistance to me is really the question. If it is of assistance to the court, if it is of assistance to the Commission, I'm happy to do it.

MR TOKLEY: Thank you. Would your Honour be --

1
2 THE CHAIR: Again with the caveat, it's not a competition.
3
4 MR TOKLEY: No, understood.
5
6 THE CHAIR: We're not really interested as to who got
7 there first. What we want to know is are they all in the
8 right place now. That's what we are really interested in,
9 in this context. We do need to understand how
10 organisations may have responded in the past, because
11 that's our terms of reference - they require us to do that.
12 But we're not in the business of comparative exercise.
13
14 MR TOKLEY: Understood, your Honour. I think it goes to
15 the point that because these procedures have evolved over
16 time - because the practices and procedures have evolved
17 over time, the ultimate submission one would make is one
18 can't look back 25 years and simply judge what occurred 25
19 years ago by today's standards.
20
21 THE CHAIR: No, but there is a necessity for us to
22 identify whether what happened in the past was good or bad.
23
24 MR TOKLEY: Correct, your Honour. That is correct.
25
26 THE CHAIR: And if it doesn't meet today's standards, we
27 will say so, because people need to understand where
28 deficiencies were, if there were deficiencies in the past.
29 And then our concern is to make sure everything is as good
30 as it can be going forward.
31
32 MR TOKLEY: We understand. I suppose the point is that
33 one has to put things into context, and 25 years ago, the
34 context was different from today, where there is a much
35 greater awareness about such matters.
36
37 THE CHAIR: That's a question, Mr Tokley. I don't think
38 it can be covered by that short statement.
39
40 MR TOKLEY: And not intended to be covered by it, but
41 simply to, again, for purposes of assisting of the
42 Commission - and I have taken on board all that your Honour
43 has said, but for the purpose of assisting the Commission
44 and in respect of the opinion that is proffered, it would,
45 I think, be better, in my respectful submission for the
46 Commission to have that assistance.
47

1 THE CHAIR: We're happy to receive it, on the condition
2 that the doctor is available in some way to be asked
3 questions about it. But mindful that whoever asked her to
4 give this form of statement in some respects was missing
5 the point.

6
7 MR TOKLEY: Understood.

8
9 THE CHAIR: I don't want the point to be emphasised in a
10 way that is not going to be helpful to us.

11
12 MR TOKLEY: Thankfully we have the transcript and
13 your Honour's words.

14
15 Q. Dr Applewhite, you were asked some questions by my
16 learned friend Mr Stewart about some extracts from a final
17 report of the Australian Institute of Family Studies called
18 "Conceptualising the prevention of child sexual abuse". In
19 particular, you were asked some questions about -

20
21 THE CHAIR: That's exhibit 29-015 --

22
23 MR TOKLEY: Q. - Mr Finkelhor's four preconditions
24 model?

25 A. Yes.

26
27 Q. I understand that Mr Finkelhor is a sociologist?
28 A. Yes, I - I'm not sure that he's a sociologist. He
29 could be a psychologist, but he may be a sociologist.
30 I would have to look what his educational background was.
31 But he has been studying in this field since the late
32 1970s.

33
34 Q. I understand he was one of the persons referred to in
35 the Awake! Magazine article that you referred to in your
36 report as well?

37 A. Yes. He's one of the seminal researchers in this
38 field.

39
40 Q. On page 31 of that document, which you were taken to,
41 there was a table that you were taken to.

42 A. Yes.

43
44 Q. You were asked questions about the social and cultural
45 factors?

46 A. Yes.

47

1 Q. Going above that, do you see the paragraph which says:
2
3 *The third and fourth preconditions move the*
4 *explanation for offending beyond the*
5 *perpetrator to account for their external*
6 *environment.*
7
8 A. Yes.
9
10 Q. And do you see the sentence beginning:
11
12 *External inhibitors can include if there*
13 *are bystanders around to protect the child*
14 *(eg the child's mother, other family*
15 *members, teachers, etc) or if the*
16 *environment is not conducive to abusing*
17 *a child.*
18
19 A. Yes.
20
21 Q. Is it your understanding that the Jehovah's Witnesses
22 place great emphasis upon the family unit?
23 A. In this context or just in general?
24
25 Q. In general and in this context.
26 A. In general, they place great emphasis on the family
27 unit, yes.
28
29 Q. They place great emphasis upon the family protecting
30 the child?
31 A. The publications speak both to bystanders or general
32 people around, but also speak very specifically to parents
33 and what parents can do and things that they should pay
34 attention to, and situations that they should avoid
35 allowing their child to be in.
36
37 Q. You were taken to a couple of examples of the
38 publications by my learned friend.
39 A. Yes.
40
41 Q. But I take it you can say, of your own knowledge, that
42 there is more than just a couple of articles dealing with
43 the question of child molestation?
44 A. There is more than just two, yes.
45
46 Q. And, in fact, in many of those articles, the emphasis
47 is placed upon the family as the principal environment for

1 the purposes of protecting children from abuse?
2 A. Both protecting and also responding if the child
3 discloses.

4
5 Q. You were asked some questions going back to the
6 table - you were asked some questions about the table and,
7 in particular, you were asked some questions about the
8 social and cultural factors.

9 A. Yes.

10

11 Q. I take it, because I'm not familiar with the work of
12 Mr Finkelhor, that the table is really just a summary way
13 of expressing some social and cultural factors, and to
14 really understand the points that are being made, one would
15 need to actually read what has been written about such
16 matters?

17 A. Right. Well, so this was - this is a model that was
18 advanced in 1984, and so various pieces of the model have
19 been examined through empirical research to determine which
20 would be more or less important. So there's both the
21 background of what brought them to this model but then
22 there has been research that has been conducted over the
23 past 30 years to look at particular pieces of it.

24

25 Q. And the social and cultural factors - do you know
26 whether those social and cultural factors were considered
27 in the context of religious organisations?

28 A. I don't know the answer to that.

29

30 Q. So it may be that the social and cultural factors
31 there set out are not specific to or, indeed, based upon
32 any knowledge or research involving religious
33 organisations?

34 A. I don't know.

35

36 Q. His Honour asked you some questions, and I think the
37 answer that you gave talked about the maximum choices
38 available - do you recall that answer?

39 A. Yes.

40

41 Q. I take it that's in the context of the more sensitive,
42 the more nuanced the response, the more choices available
43 to the victim, the more likely it is that the appropriate
44 response will be provided?

45 A. That's what I mean, yes.

46

47 Q. So in considering the choices and in considering the

1 need for sensitivity, one would consider a number of
2 variables, including, for example, the age of the victim?

3 A. Yes.

4
5 Q. The religious belief of the victim?

6 A. So I want to understand your question. What I was
7 saying was that allowing the person to answer specific
8 questions about what they need and what is going to make it
9 easier for them is appropriate.

10
11 Q. Yes.

12 A. But now I think that you are saying more
13 comprehensively the response system itself should
14 accommodate for various characteristics of the person?

15
16 MR STEWART: Your Honour, it may be helpful to the witness
17 and to the Commission if my learned friend asked it as an
18 open question, not a leading question, and then the witness
19 would be able to respond.

20
21 THE CHAIR: You take whatever course you like. I think
22 I know what you are trying to say.

23
24 MR TOKLEY: Thank you, your Honour.

25
26 THE CHAIR: It will always be dependent upon the
27 appropriate option being one that's offered, though, of
28 course.

29
30 MR TOKLEY: Yes, your Honour, yes. It is the simple point
31 that ultimately, some victims may wish to confront the
32 abuser, some may not. Some victims may be comfortable in
33 one environment and others may not.

34
35 THE CHAIR: Undoubtedly true. As you know, at the moment,
36 we have documents that tell us what the rules are. You
37 will need to help us, tell us if there are other rules and
38 where they are to be found.

39
40 MR TOKLEY: Understood, your Honour. Thank you,
41 your Honour. No further questions.

42
43 THE CHAIR: Thank you. No-one else has any questions?

44
45 MR COYNE: No, your Honour.

46
47 MR STEWART: I have nothing further, your Honour.

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THE CHAIR: Doctor, thank you for your evidence today. Now, if Mr Tokley wants you to prepare further material then the Commission would welcome it, on condition that it comes within probably a couple of weeks at the outside - is that possible?

A. I will have to look at my calendar and look at what I am asked to do.

Q. I don't think we can accept more than two weeks from today.

A. I understand, yes.

Q. Given our time frames. Then, after that, you would have to be available, perhaps by video-link, from wherever you happened to be at the time - I assume you won't necessarily be in Australia in two weeks time?

A. Probably not. I would just want to make sure that it's something that is helpful to the Commission and that that's spelled out so that I can be sure that I'm within what it is that you would like to review.

Q. Mr Tokley will help you there. But I stress again, as I have said to Mr Tokley, it is not a competition. We're not really interested if you happen to have an opinion that someone is better than someone else, you understand that?

A. Yes. My thinking is if I can add something as far as the historic piece, then it might be - because sometimes, there are societal norms, organisational norms and then individual problems, and so maybe I would be able to help out with some of that.

Q. We need all the help we can get.

A. Thank you.

Q. But otherwise, thank you. Today you are excused on those conditions.

A. Thank you very much.

<THE WITNESS WITHDREW

MR STEWART: Your Honour, it's not far from 4 o'clock. There are two relatively short witnesses who are based in Brisbane. I released them for this afternoon to go back to Brisbane, and we will arrange to have them by video conference next week.

1 The next substantive witness, Mr de Rooy, will come
2 and start at 10am on Monday, if that is convenient to
3 your Honour and Commissioner.
4

5 THE CHAIR: We will adjourn now until 10 o'clock on
6 Monday.
7

8 **AT 3.40PM THE COMMISSION WAS ADJOURNED TO MONDAY, 3 AUGUST**
9 **2015 AT 10AM**

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