



Royal Commission
into Institutional Responses
to Child Sexual Abuse

REPORT OF CASE STUDY NO. 7

Child sexual abuse at the
Parramatta Training School
for Girls and the Institution
for Girls in Hay

OCTOBER 2014

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for Girls and the Institution for Girls in Hay

October 2014

CHAIR

The Hon. Justice Peter McClellan AM

Contents

Preface	1
Executive summary	4
1 The institutions and their historical context	7
1.1 Parramatta Girls and the Hay Institution	7
1.2 Child Welfare Act and out-of-home care	9
1.3 Previous inquiries into the institutions	11
2 Conditions and treatment	13
2.1 Discipline and punishment	13
2.2 Physical and medical control	15
2.3 Emotional trauma	16
3 Physical and sexual abuse	17
3.1 Alleged perpetrators	17
3.2 Superintendents	18
3.3 Deputy superintendents and Hay's Acting Manager	20
4 Reporting of abuse	24
4.1 Difficulties in reporting at the time	24
4.2 Responses to reports at the time	26
4.3 Later reporting	26
5 Effect of abuse	28
5.1 Impact on education and employment	28
5.2 Impact on mental and physical health	29
5.3 Impact on families and communities	31
6 Redress	33
6.1 Compensation and civil claims	33
6.2 Survivors' views on redress	34
6.3 Action to improve redress schemes	36
7 Systemic issues	38
7.1 Our focus on systemic issues	38
7.2 Issues emerging from this case study	39
APPENDIX A: Terms of Reference	40
APPENDIX B: Public Hearing	45
Endnotes	48

Preface

The Royal Commission

The Letters Patent provided to the Royal Commission require that it ‘inquire into institutional responses to allegations and incidents of child sexual abuse and related matters’.

In carrying out this task, we are directed to focus on systemic issues but be informed by an understanding of individual cases. The Royal Commission must make findings and recommendations to better protect children against sexual abuse and alleviate the impact of abuse on children when it occurs.

For a copy of the Letters Patent, see Appendix A.

We are approaching our work through three methods:

- public hearings
- private sessions
- research.

Public hearings

A royal commission commonly does its work through public hearings. These involve intensive investigation, research and preparation by the staff and Counsel Assisting. Although a hearing might only take a few days in hearing time, the preparatory work that our staff and parties with an interest must do can be very significant.

The Royal Commission is aware that sexual abuse of children has occurred in many institutions, all of which could be investigated in a public hearing. However, to attempt that task, a great many resources would be needed over an indeterminate, but lengthy, period. For this reason, the Commissioners have accepted criteria by which Counsel Assisting will identify appropriate matters for a public hearing and bring them forward as individual ‘case studies’.

The decision to conduct a public hearing is informed by whether it will advance an understanding of systemic issues and provide an opportunity to learn from previous mistakes. This will ensure that our findings and recommendations have a secure foundation. In some cases, the relevance of the lessons learned will be confined to the institution that is the subject of the hearing. In other cases, they will be relevant to many similar institutions in different parts of Australia.

Public hearings help us understand the extent of abuse that might have occurred in particular institutions or types of institutions. This will give the Royal Commission insight into the way various institutions were managed and how they responded to allegations of child sexual abuse. Where we identify a significant concentration of abuse in one institution, it is likely that the matter will be brought forward to a public hearing.

Public hearings also tell the story of some individuals to help us all understand:

- the nature of sexual abuse and the circumstances in which it can occur
- the devastating impact it can have on people's lives.

A detailed explanation of public hearings is available in the practice notes on our website at www.childabuseroyalcommission.gov.au. Public hearings are streamed live over the internet.

Private sessions

The second pillar of the Royal Commission's work involves private sessions.

When the Royal Commission was appointed, it was apparent to the Australian Government that many people (possibly thousands) would wish to tell us about their personal history of child sexual abuse in an institutional setting. As a result, the Commonwealth Parliament amended the *Royal Commissions Act 1902* to create a process called a 'private session'.

A private session is conducted by one or two Commissioners and is an opportunity for a person to tell their story of abuse in a protected and supportive environment. By 5 September 2014, the Royal Commission had held 2,318 private sessions and more than 1,294 people were waiting to attend one. We are including accounts from these sessions in our interim and final reports in a de-identified form.

Research program

The Royal Commission also has an extensive research program. Apart from the information we gain in public hearings and private sessions, the program will draw on research by consultants and the original work of our own staff. Significant issues will be considered in issues papers and discussed at roundtables.

This case study

Child sexual abuse at Parramatta Girls and the Hay Institution

This is the report of the public hearing that examined the experiences of women who were sexually abused as children at the Parramatta Training School for Girls (Parramatta Girls) and the Institution for Girls in Hay (Hay Institution) in New South Wales. This was appropriate for a case study for several reasons.

First, many women (including the 16 who gave evidence at the hearing) contacted the Royal Commission with stories of abuse. Early on, we flagged both institutions as being subject to a cluster of allegations.

The public hearing enabled us to bear witness to these stories, which spanned more than two decades, from 1950 to 1974.

It also allowed us to continue our analysis of:

- the out-of-home care system in Australia
- redress schemes available for victims of child sexual abuse.

Although out-of-home care is now very different from the system that was in place when Parramatta Girls and the Hay Institution were open, the experiences of these women form an important part of the history of the State's institutional care.

General issues

The Royal Commission has identified some issues of general significance that arose in this case study (see section 7).

We will consider these further in other public hearings or roundtables.

Executive summary

Key points

This case study report bears witness to the experiences of inmates of the Parramatta Training School for Girls and the Institution for Girls in Hay, New South Wales. It begins by describing both institutions and the law that governed out-of-home care at the time. It then looks at the conditions that girls faced daily, and the physical and sexual abuse allegedly perpetrated by 11 staff.

The report also examines the issues of reporting and redress, with evidence of the difficulties that inmates have experienced since their release. It finishes by outlining the Royal Commission's ongoing work to research these and other systemic issues.

1 The institutions and their historical context

In 1887, the NSW Government opened the Parramatta Girls Industrial School in Sydney. Later known as the Parramatta Training School for Girls (Parramatta Girls), it provided out-of-home care for girls who were 'neglected', 'uncontrollable' or convicted juvenile offenders.

During the mid-1900s, the inmates at Parramatta began rioting over the conditions there. They claimed they were being subjected to harsh discipline, punishment and sexual abuse. The government responded in 1961 by setting up a maximum security annex, the Institution for Girls in Hay (Hay Institution), to house the most rebellious and difficult girls.

In its early days, the Hay Institution received praise for transforming these girls, but both institutions closed in 1974 after a public outcry about their conditions.

The Royal Commission heard evidence from 16 former inmates of Parramatta Girls, four of whom also spent time at the Hay Institution. Although the school was operating under the *Child Welfare Act 1939*, evidence from these women suggests that they were treated severely and received punishment well beyond what the Act allowed. All were 17 or younger at the time.

Since then, the State's model of out-of-home care has changed significantly. Legislation has been repealed and the government department that ran both institutions no longer exists. The experiences of inmates at Parramatta Girls and the Hay Institution have also been examined by two previous inquiries – *Bringing Them Home* and *Forgotten Australians*.

2 Conditions and treatment

Many of the women who gave evidence described a harsh system of discipline and control at Parramatta Girls. Some of the rules included not speaking unless spoken to, not turning over in bed and only going to the toilet at certain times of day.

Rules at the Hay Institution were even harsher. Witnesses said that girls were subjected to military-style discipline and forced to march everywhere with their eyes to the ground. They were only allowed to talk to each other for 10 minutes a day.

At both institutions, girls often faced severe punishments for disobedience. They might be deprived of food or told to scrub floors. But the worst punishment at Parramatta Girls was being sent to an isolation cell. Some witnesses revealed that they were physically and sexually abused while in isolation. They were sometimes later transferred to the Hay Institution.

In this system of discipline and control, there was no privacy for inmates. They were watched on the toilet and in the shower, and regularly had to undergo invasive medical examinations and embarrassing body checks. Some were drugged.

Many faced psychological abuse as well, and witnesses told us that officers called them nobodies, sluts and liars. Inmates resorted to sticking pins into their bodies to show they were tough, to offset the pain of the abuse or to kill themselves.

3 Physical and sexual abuse

Numerous male staff, and occasionally other girls, were said to have physically and sexually abused the inmates at both institutions. The public hearing heard evidence about 11 men, most of whom were superintendents or deputies at Parramatta Girls. These men were entrusted with the girls' care but witnesses spoke of regular bashings, rapes and assaults.

Sometimes, a pair of men would reportedly beat or rape a girl together. Witnesses recalled that Superintendent Percival Mayhew and Deputy Superintendent Gordon Gilford were the scariest and cruellest officers.

Most of the alleged perpetrators were never reported or investigated. Others resigned or were dismissed after inquiries into their conduct. However, our research suggests that not one of these men was ever charged with a criminal offence. All but three have now died.

4 Reporting of abuse

Most former inmates who gave evidence said that they did not report the abuse at the time. Some felt nobody would believe them. Some were too ashamed. Others said they were frightened of being punished.

Also, many inmates thought there was nobody to report to. When welfare officers visited, girls were reportedly told to keep their mouths shut or they were locked in isolation. If they did have the chance to speak, they were not asked the right questions.

Numerous women said that although they did not report the abuse, they believed other staff must have been aware of what was happening. And those who did speak out often received no help or support. Only two of the five witnesses who reported their abuse to a person in authority were removed from danger.

Even after leaving Parramatta Girls or the Hay Institution, former inmates found it hard to report their abuse. They said that family members did not believe them or told them to keep quiet. The police would not prosecute in two cases because the alleged perpetrators were too old or too ill.

5 Effect of abuse

The physical and sexual abuse at both institutions had devastating effects on the former inmates, and continues to affect their lives and families.

Several witnesses gave evidence that they received no support from the State of New South Wales once they left Parramatta Girls. They had little education and few prospects. Some became homeless. Some turned to prostitution or crime to support themselves.

Those who did find jobs often struggled to maintain them because they found reporting to authority difficult. Nine witnesses told us that they now receive a disability or other pension. Some have no substantial superannuation, assets, savings or health insurance.

All gave evidence that their mental health has suffered because of the abuse. They face ongoing psychological trauma, including depression, stress disorders, flashbacks and trust issues. Most have considered or attempted suicide at least once.

As a result, several witnesses said that they have found it hard to maintain relationships with their families and communities. Some have struggled with their marriages or been with abusive partners. Others have had children taken into care and fear they have been poor role models. At least one who identifies as Aboriginal has been isolated from her community.

6 Redress

Only two of the former inmates who gave evidence have received compensation from the State. Others have tried but failed to bring civil claims because too much time has passed. Some would like the State to pay for health costs and funerals. Others seek opportunities to be near relatives or memorialise the site.

To date, the State has not set up any schemes to provide redress, unlike several other states. However, Valda Ruis, Chief Executive of Juvenile Justice NSW, gave evidence that she believed the Department of Premier and Cabinet is currently 'looking at' the issue.

7 Systemic issues

The Royal Commission is considering redress as one of the systemic issues arising from this case study. Other key issues relate to out-of-home care and juvenile justice.

While the model of out-of-home care in New South Wales has changed significantly since Parramatta Girls and the Hay Institution were open, we can still learn from the experiences of former inmates. The evidence has highlighted the particular vulnerability of children to sexual abuse while in the care of the State.

We have already released three issues papers on related topics and will continue to inquire into these topics through public forums, hearings and research.

1 The institutions and their historical context

Key points

This section describes the Parramatta Training School for Girls and the Institution for Girls in Hay, two state-run institutions that housed girls from the welfare or juvenile detention systems in New South Wales. Claims arose that girls were being mistreated and both institutions closed in 1974. Since then, two inquiries have considered their operation and the State's model of out-of-home care has changed.

1.1 Parramatta Girls and the Hay Institution

Parramatta Girls began as a reformatory and training school

The Parramatta Girls Industrial School was set up in 1887, around three kilometres north of Parramatta's central business district. It was both:

- a reformatory for girls apprehended on summary or indictable offences
- a training school for girls from the welfare system.

The girls were as young as 8 (in 1905) or 10 (in the 1950s).¹

Estimates suggest that over 30,000 girls passed through the school between 1887 and 1974. On average, it housed between 160 and 200 girls at once, although numbers peaked at 307 in 1970.² Girls were usually committed for between six months and three years, and they were eligible for release when they turned 18.³

Sixteen former inmates of Parramatta Girls gave evidence:

Coral Campbell	Diane Chard *	Mary Farrell-Hooker	Dianne Graham
Fay Hillery	Yvonne Kitchener *	Robin Kitson	Denise Luke
Jennifer McNally	Janet Mulquiney	OA	Wendy Patton
Lee Powell	RN	Wilma Robb *	Robyne Stone *

* These women also spent time at the Hay Institution.

Riots in the 1940s and 60s suggested trouble at the school

On Christmas Day 1941, the first of a series of riots took place at the school, with the inmates protesting against the conditions. The girls then rioted almost yearly until 1946. There were two investigations by the Child Welfare Advisory Committee:⁴

Year	Finding
1943	Found Parramatta Girls was being run as a punitive institution
1945	Criticised the school's management and the approach used to deal with the girls

As a result, the institution's name was changed to Parramatta Training School for Girls.⁵ It was constituted under section 49 of the *Child Welfare Act 1939* (NSW) as an institution for the reception, detention, maintenance, discipline, education and training of young girls.⁶ This Act is discussed in Section 1.2.

In February 1961, a second spate of riots took place.⁷ Ms Patton gave evidence that mattresses were on fire and she tried to escape by climbing onto the roof of the hospital block. On the roof, she saw television reporters and she shouted to them, 'We're being raped. We're being tortured. There are girls in there that are pregnant that have never been outside the walls.' She said that she was arrested and sentenced to one month of hard labour in Long Bay Gaol.⁸

The Hay Institution then became a maximum security annex

Soon after these riots, in July 1961, a former colonial gaol at Hay in regional New South Wales became a maximum security annex to Parramatta Girls. It could house 12 of the most difficult and rebellious girls (aged 15 or over) at once.⁹ The site, at 225 Church Street, was known as the Institution for Girls in Hay.¹⁰

The Superintendent of Parramatta Girls would recommend girls to be transferred to the Hay Institution. He or a psychiatrist would prepare a report beforehand, usually recording ongoing disciplinary issues as the reason for the transfer. Then the Minister for Child Welfare had final approval under the Act.¹¹ There was no other court process involved and no girl was directly committed to the Hay Institution from the Children's Court.¹²

Girls were officially sent there for three months, but these terms were often extended and some girls moved between the two institutions multiple times.¹³ The manager at the Hay Institution would prepare progress reports for the Under Secretary of the Department of Child Welfare and recommend whether each girl should stay or return to Parramatta Girls.¹⁴

Ms Kitchener told the hearing, 'If you were outspoken or stood up for yourself at Parramatta Girls, they would send you to Hay to try and get you to conform to their way of thinking.'¹⁵

Former inmates gave evidence of being drugged and transferred to Hay

Other former inmates spoke about the transfer process. Ms Robb said it was arbitrary and informal. Girls were given a large dose of the drug Largactil, put on a train and handcuffed to the seat.¹⁶ She said that she was transferred because she was overheard discussing a possible riot with other inmates.¹⁷ Nobody told her what was happening or where she was going.¹⁸

Ms Chard said that, one evening, she too was transferred to Hay on a train, handcuffed to her chair. That day, she had been sexually abused by an officer, placed in segregation and drugged with Largactil.¹⁹ She said that girls were given a psychiatric assessment to work out if they could be transferred, but the process was a fait accompli and the assessment just something they had to do.²⁰

Another witness, known as RN, gave evidence that she was threatened with transfer if she did not follow the requests of the Superintendent, who was sexually abusing her.²¹

Ms Mulquiney said that if a girl disappeared for a couple of days and did not return, you knew that she had been put on the train to the Hay Institution. She said that the officers would take girls in the middle of the night and you would get up the next morning and that person just would not be there.²²

On 11 March 1962, the *Sydney Morning Herald* reported the Department of Child Welfare saying that the Hay Institution had been ‘one of the main factors in ending rioting and other troubles at Parramatta’. The newspaper also reported that:

[Hay] was a vital experiment which had brought amazing changes in rebellious girls’ mental outlook and physical condition.²³

Claims of brutality brought the closure of both institutions

A decade later, the view of both institutions had changed. The Women’s Liberation Movement protested about the conditions at Parramatta Girls and the Hay Institution in 1973 and these protests attracted media and parliamentary attention.²⁴

In July, the ABC TV show *This Day Tonight* exposed the brutality of the institutions. This was followed by further protests outside Parramatta Girls in December.

The following April, the Minister for Child Welfare announced that Parramatta Girls would close. The site then became Kamballa, a training school for girls, and Taldree, a remand centre for boys, and later the Norma Parker Detention Centre.²⁵

Most of the site is now vacant. It will soon be considered for the National Heritage List, after a nomination from a group of former inmates in 2011.²⁶

The Hay Institution closed in June 1974,²⁷ and is now a museum.²⁸ In 2007, a group of former Hay girls returned to the site and placed a memorial plaque with the words ‘Let no child walk this path again’ on the ground.²⁹

1.2 Child Welfare Act and out-of-home care

Act defined children who could be committed to institutional care

Between 1950 and 1974, Parramatta Girls operated under the *Child Welfare Act 1939* (NSW). The Act, which was replaced in 1987, dealt with three types of children and young people: those who were classed as ‘neglected’ or ‘uncontrollable’ and convicted juvenile offenders.³⁰

A ‘neglected’ child was defined as one:

- who was destitute or had no visible means of support
- who was ill-treated
- whose parents were not exercising proper care or were unfit to do so
- who, without a lawful excuse, did not attend school regularly
- who was falling into bad associations or exposed to moral danger.

An ‘uncontrollable’ child was one who was not or could not be controlled by his parent or caregiver.

The Act made little distinction in the treatment of those who were neglected and needed State care, and those who were uncontrollable or convicted juvenile offenders.³¹

Almost all the hearing’s witnesses came from the welfare system

If children or young people were found to be in one of these three categories, the Children’s Court could commit them to an institution established under the Child Welfare Act, for up to three years.³²

The superintendent of that institution then had custody until:

- they turned 18
- they were discharged, transferred, apprenticed or placed elsewhere.³³

Nearly all the former inmates who gave evidence were committed to Parramatta Girls as part of the welfare system. Most of them said that they had already suffered physical, emotional and sexual abuse at the hands of family members or foster parents, or in other institutions.

Only one, Ms Kitson, was a juvenile offender. She was committed to Parramatta Girls for six to nine months as a 15-year-old, after she was arrested in Wilcannia. The reason for her arrest was not given in evidence to the Royal Commission.³⁴

Act allowed corporal punishment and isolated detention

Part 11 of the Child Welfare Act allowed institutional staff to punish inmates in particular situations, including if they disobeyed the rules, were idle or negligent in their work, or behaved in a way that ‘prejudiced good order and discipline’.

Punishments included:

Type ³⁵	Level	Conditions
Corporal punishment	Up to 3 strokes on the hands	Every effort had to be made to enforce discipline without corporal punishment
Isolated detention	Up to 24 hours’ detention for girls aged 14–16 Up to 48 hours’ detention for girls aged 16 or older	Detention was in a purpose-built room

The evidence of former inmates of Parramatta Girls suggests that they received punishment that went well beyond what the Act allowed.

NSW Government has no records relating to institutional policies

The model of out-of-home care in New South Wales has changed significantly since Parramatta Girls and the Hay Institution were open. Legislation has been repealed and the government department that ran both institutions no longer exists.

The Royal Commission issued a summons to its successor, the Department of Family and Community Services (which shares responsibility for the care or custody of children under State protection with Juvenile Justice NSW). We sought specific records on policies and procedures relating to each institution's operation between 1950 and 1974. The department told us that no records existed.

1.3 Previous inquiries into the institutions

Bringing Them Home looked at the impact on Indigenous families

The Royal Commission is not the only inquiry to have considered Parramatta Girls and the Hay Institution since their closure.

In 1995, the Human Rights and Equal Opportunity Commission inquired into the separation of Aboriginal and Torres Strait Islander children from their families. It heard evidence from several witnesses who had been forcibly removed and placed at Parramatta and Hay. These witnesses spoke of the physical and sexual abuse they experienced at the hands of those charged with their care.

In its *Bringing Them Home* report, the inquiry noted that the definition and interpretation of key terms in the Child Welfare Act adversely affected Indigenous families:

'Neglect' was defined to include destitution and poverty was a constant feature of most Aboriginal people's lives. Aboriginal lifestyles, adopted from choice or necessity, such as frequent travelling for cultural activities or seeking employment, resistance to non-Indigenous control and child rearing by extended family members were regarded by courts as indicative of neglect. Aboriginal children who refused to attend school were labelled 'uncontrollable' as were Aboriginal girls running away from situations of sexual abuse or becoming pregnant. Yet until 1972 school principals could and did exclude Aboriginal children from schools on the ground of 'home condition' or 'substantial community opposition'.³⁶

Forgotten Australians commented on cruelty, discrimination and deprivation

Then, in August 2004, the Senate Community Affairs Reference Committee published *Forgotten Australians: A report on Australians who experienced institutional or out-of-home care as children*. This inquiry also considered Parramatta Girls and the Hay Institution, and received submissions from two witnesses who gave evidence at our hearing, Mary Farrell-Hooker and Wilma Robb.³⁷

The inquiry's report observed that Parramatta Girls was the main place for girls committed to institutional care and that these girls were judged and treated very badly. It said:

Girls were treated far worse than boys ... it was because of entrenched Victorian attitudes to fallen women and the view that girls were inherently more difficult to reform than boys. Those attitudes you can see in statements by Henry Parkes ... and by a succession of people who were involved in the child welfare systems right up to the 1950s.

The report concluded that girls were discriminated against, including through the extensive use of isolated detention and segregation:

Often young women were punished even though they had been the victims of serious crime. As the entry books ... show, girls who were raped or the victims of incest often found themselves committed to the institution, while the perpetrators remained free.

The report found that Parramatta Girls:

- became renowned for extreme cruelty
- was the subject of many inquiries that were scathing of its activities
- achieved notoriety in the 1960s when many of the girls rioted against its conditions.

Forgotten Australians also commented on the Hay Institution:

There was a consistent theme at Hay where girls were drugged when taken there, made to scrub paint work off walls and undertake tasks that were beyond their capacities, and were deprived of food and subjected to many harsh punishments.³⁸

Royal Commission is examining the success of past recommendations

The *Bringing Them Home* and *Forgotten Australians* reports made recommendations relating to various aspects of child institutional abuse, including processes for redress, counselling, recognition and reparation.

The Royal Commission is examining these past inquiries and will look at whether their recommendations have been implemented. They will inform our work.

In 2008, the Australian Senate inquired into the progress of the *Forgotten Australians* Report. The Senate Committee made another 16 recommendations and determined that the implementation of the previous recommendations was 'poor':

The Committee agreed that, despite some areas of improvement, the implementation of the recommendations of the *Forgotten Australians* report has in many ways been poor, and most particularly in critical areas where leadership is required by the Commonwealth government, both to ensure adequate recognition of the historical truths acknowledged in its original response, and to fashion a truly coordinated national response that delivers practical services and outcomes for those who suffered the horrific abuse and shameful neglect in care over the last century.³⁹

2 Conditions and treatment

Key points

This section looks at the conditions and treatment that inmates at Parramatta Girls and the Hay Institution faced daily. From deprivation and isolation to psychological abuse and humiliation, witnesses at the public hearing described a severe system of discipline and punishment that was designed to control, subdue and inevitably 'break' the girls. This left many with physical and emotional scars.

2.1 Discipline and punishment

Girls at Parramatta were controlled from arrival, with many stringent rules

Many of the women who gave evidence described a harsh system of discipline and control at Parramatta Girls. It began on arrival when, according to Ms Mulquiney and Ms Hillery, the girls had their hair hacked off.⁴⁰

The girls were then:

- regularly called to attention, rarely allowed to speak to each other and not allowed to talk unless spoken to by an officer⁴¹
- forbidden from speaking in dormitories, with those who did being forced to spend the night standing with their legs apart and their hands behind their backs⁴²
- only allowed to go to the toilet at set times during the day⁴³
- not allowed to roll over in bed because they were suspected of doing 'something disgusting' if they were moving too much.⁴⁴

Ms Mulquiney listed some of the rules: Do not answer back; do not speak unless spoken to; toe the line or you will never go home.⁴⁵

Hay Institution guards used tougher, military-style discipline

Rules at the Hay Institution were even harsher. When Ms Robb arrived there, she said that the guards greeted her by saying, 'Welcome to Hay. We will either make you or break you. Your choice.' Her hair was also cut off.⁴⁶

Several witnesses gave evidence that girls were subjected to military-style discipline. They could not go anywhere without marching or being called to attention.⁴⁷ Ms Stone said, 'The Hay Institution was run like a concentration camp. It was a place where you had to walk with your eyes to the ground. We had to march everywhere.'⁴⁸

Ms Chard agreed that girls were not allowed to raise their eyes to look at the staff or other inmates.⁴⁹ Ms Kitchener explained that there were red dots along the pathways. The girls had to follow these dots, which kept them six feet apart.⁵⁰

Ms Stone also said that girls were not allowed to talk.⁵¹ Ms Robb spoke too about their communication being strictly controlled, with only 10 minutes of conversation each day. She said this was known as the 'silence system' and was designed to break the human spirit.⁵²

Other evidence described girls being forced to:

- do manual labour, such as breaking bricks and laying footpaths⁵³
- do 100 push-ups during exercise time, with an officer ('QW') putting his foot on their backs to make the task more difficult⁵⁴
- sleep on one side so their faces were always visible.⁵⁵

Punishments were varied, but severe

At both Parramatta Girls and the Hay Institution, girls often faced harsh punishments if they were deemed to have stepped outside these rules.

For example, if girls at Parramatta were caught sleeping facing the wall, they would be dragged out of bed and taken to scrub the concrete walkway on their knees with a bucket of water and a brush.⁵⁶ At Hay, the wardens might instead make them stand for an hour.⁵⁷

Scrubbing concrete, floors or rafters, sometimes for more than 12 hours, was a common form of punishment.⁵⁸ So too was food deprivation.⁵⁹

Ms Chard also said that her teeth were forcibly removed, even though there was nothing wrong with them,⁶⁰ and Ms Kitson had the same done to her for being a 'bad girl'.⁶¹

Isolation in the 'dungeon' was one of the worst punishments

The worst punishment at Parramatta Girls was reserved for those who disobeyed the officers or those the officers disliked. These girls were sent to isolation, and were sometimes later transferred to the Hay Institution.⁶²

Witnesses told us that they were often placed in an isolation cell for prolonged periods. Ms Chard, for one, said she was sent to isolation for three weeks for misbehaving.⁶³

Some witnesses said that they were physically and sexually abused by officers while in isolation or were placed there after having been abused. Ms Patton gave evidence that the isolation cells, known as the 'dungeon', were where Superintendent William Gordon would sexually abuse her. She said that the superintendent ordered a female officer to remove her clothes and empty her cell. There was no light and no bucket of water, and only sour milk in the morning.⁶⁴ Ms Patton was once sent to isolation for 72 hours after a food fight. She was again stripped naked and left without a bed or access to the toilet.⁶⁵

Ms Luke gave evidence that she too was sent to the dungeon, where she would be left naked. She said that Deputy Superintendent Gordon Gilford sexually abused her there several times.⁶⁶

Ms Powell described how she would be physically abused and then taken to isolation for a couple of days so that nobody would see her.⁶⁷ Ms Farrell-Hooker also spoke of being sent to isolation for up to 72 hours after sexual abuse. She said that by the time the girls got out of isolation, their bruises were starting to fade.⁶⁸

Meanwhile, Ms Robb gave evidence that, at the Hay Institution, she once spent a full day in the isolation cell in winter without a mattress. She said that she spent the time removing the hairs from her legs but, when an officer noticed her legs were hairless, she was returned to isolation for another 24 hours.⁶⁹

2.2 Physical and medical control

Inmates had no privacy when using the toilets or showers

Witnesses gave evidence that there was a complete lack of privacy at both institutions, even in the isolation cells, which strengthened the officers' control over the inmates.

At the Hay Institution, for instance, Ms Robb said that one officer was assigned to each inmate so they were never alone and under constant supervision.⁷⁰

There were no doors on the toilets or showers and the staff would watch them in the bathrooms.⁷¹ At Hay, these staff were often male and the girls were not allowed to turn their backs in the shower.⁷²

Ms Kitchener said the officers controlled everything, even the distribution of toilet paper and sanitary napkins.⁷³ Girls had to show the officers their dirty sanitary pads before being given new ones,⁷⁴ an experience that:

- was 'embarrassing', 'humiliating' and 'barbaric'
- left them 'without pride or self-respect'
- deprived them of their dignity.⁷⁵

Invasive medical examinations were 'vile' and 'degrading'

This lack of privacy extended to regular physical examinations.

On arrival at Parramatta Girls, several witnesses said they were 'strapped to a table' and forced to undergo an invasive examination.⁷⁶ This was 'vile', 'scary' and 'humiliating and degrading'.⁷⁷ Ms Kitchener said that when she refused the examination Deputy Superintendent Gilford physically abused her.⁷⁸

At both institutions, girls faced embarrassing body checks every day. Parramatta inmates had to drop their towels before they had a shower, and bend over to be examined by female officers.⁷⁹ Hay inmates were examined by both male and female officers.⁸⁰ Ms Robb said this experience was all about showing that the officers had 'power'.⁸¹

Officers would also occasionally perform full body examinations where girls would be strip-searched with their legs spread and hands against the wall.⁸²

Medication sedated the girls so they could be controlled and abused

At Parramatta Girls, some inmates were forcibly given the drug Largactil to sedate them.⁸³ Ms Farrell-Hooker gave evidence that tea pots were spiked with medication to curb sexual

drive and calm the girls down. She said that this allowed the officers to do what they wanted with them.⁸⁴

Ms Hillery, for example, described being forced to take Largactil by the superintendent to subdue her while she was sexually abused in isolation.⁸⁵ Ms Kitson was also given Largactil during isolation to control her.⁸⁶

Ms Robb said she was given Largactil daily, even though she has never had a psychotic episode and does not need medication now. The drug made her feel like 'a zombie'.⁸⁷

2.3 Emotional trauma

Girls were called sluts and nobodies

The harsh treatment of inmates at Parramatta Girls and the Hay Institution extended to psychological abuse. For example, at Parramatta:

- Ms Chard said that she was regularly told that she would be 'a nothing' and 'a nobody' who would amount to nothing.⁸⁸
- Ms Mulquiney said that the officers told the girls they were 'sluts' and 'liars' and nobody would believe what they said.⁸⁹
- Ms Kitchener said that Gilford would tell her that she was a 'black dog' and she would 'never amount to anything'. Once, when she tried to run away, Gilford took her to the holding room and said, 'You're not even worth spitting on'. He then physically and sexually abused her.⁹⁰
- Ms Campbell said that the guards called her a 'slut' and a 'prostitute'.⁹¹

The girls' mail was also read.⁹² Ms Chard said that she once wrote to her mother saying that she wanted to create a better life for herself. An officer, PE, read the letter and told her, 'You'll never amount to anything. You'll end up living on the streets.'⁹³

At the Hay Institution, Ms Robb said that the girls were not allowed to send or receive mail at all.⁹⁴

Treatment led to self-harm and psychological distress

A number of witnesses gave evidence that they and other girls self-harmed at Parramatta Girls by sticking pins into their bodies. They did this as a sign of 'toughness',⁹⁵ to offset the pain of physical and sexual abuse,⁹⁶ or in an attempt to kill themselves.⁹⁷

Inmates found it difficult to return to the routine at Parramatta Girls when they left the Hay Institution. Ms Robb described how she was punished for behaving as she was trained to at Hay, such as doing military marching, turns and calls to attention.⁹⁸ She said that Superintendent Mayhew once physically assaulted her for military marching and then sent her to isolation.⁹⁹

Ms Mulquiney observed that when girls returned from Hay, it took them a long time to adjust and 'actually look at you' during conversation.¹⁰⁰ Ms Kitson said that she could not believe the change in the personalities of those girls: 'they were mutes'.¹⁰¹

3 Physical and sexual abuse

Key points

This section sets out the physical and sexual abuse that inmates suffered at the hands of those entrusted with their care. Some of the alleged perpetrators were never reported or investigated. Others resigned or were dismissed after inquiries into their conduct. However, our enquiries suggest that not one of these men was ever charged with a criminal offence.

3.1 Alleged perpetrators

Claims of abuse relate to numerous superintendents and their deputies

The former inmates of Parramatta Girls and the Hay Institution all gave evidence of having been physically or sexually abused there. They named many officers as perpetrators:

Position	From	To	Reason for leaving
Superintendent at Parramatta Girls			
W Gordon	1957	Unknown	Unknown
J P Henderson	Feb 1961	Nov 1962	Transferred to Ormond Training School ¹⁰²
N Greenaway	Around 1963	1966	Unknown – later moved to Ormond Training School (1971) ¹⁰³
P E Mayhew	Jun 1963	Feb 1971	Transferred to Head Office of Department of Child Welfare and Social Services ¹⁰⁴
D J Monaghan	Jan 1971	Jun 1973 (suspended)	Resigned from NSW Public Service (9 Jul 1973) ¹⁰⁵
Deputy Superintendent at Parramatta Girls			
D Crawford	late 1950s	Aug 1958	Resigned ¹⁰⁶
E C Johnston	1950s	Feb 1961 (suspended)	Dismissed from NSW Public Service (16 Jun 1961) ¹⁰⁷
R Ward	Sep 1961	Nov 1962	Transferred to Ormond Training School ¹⁰⁸
G H Gilford	Apr 1967	Jun 1973 (suspended)	Resigned from NSW Public Service (8 Jul 1973) ¹⁰⁹
F Valentine	Jan 1971 (relief role)	Aug 1973	Transferred to Daruk Training School after a formal warning ¹¹⁰
Acting Manager at Hay Institution			
A W Maxwell	Jul 1967	May 1973 (suspended)	Resigned ¹¹¹

Witnesses also said that inmates were sometimes sexually abused by older girls.¹¹²

Most alleged abusers have died, but three had leave to appear at the hearing

All of the officers who were alleged perpetrators have since died, except for Greenaway, Ward and Valentine.

Ward and Valentine were granted leave to appear at the hearing and were represented by senior counsel. Greenaway was granted leave to appear after the hearing had ended and is legally represented.

None of these men provided a statement or gave evidence at the public hearing.

3.2 Superintendents

Superintendent Gordon was the earliest alleged perpetrator

The earliest of the alleged perpetrators was Superintendent William Gordon, who ran Parramatta Girls in the late 1950s.

Witness OA, a former inmate, gave evidence that Gordon would rub himself against her until he was satisfied. Sometimes he would masturbate under his desk in her company.¹¹³

Ms Graham also said that Gordon inappropriately touched her on several occasions and would slap her while she was in isolation.¹¹⁴

Ms Campbell stated that Gordon sexually abused her in the shower room, the dungeon and the donkey room – a room with a coal-fired pot-bellied stove that heated the hot water for the building.¹¹⁵ Ms Patton also spoke of Gordon repeatedly raping her. She recalled one incident where he sexually and physically assaulted her while she was in the dungeon. The incident ended when a female officer overheard the assault.¹¹⁶

The Royal Commission could not find any documents that show Gordon was ever reported, disciplined or charged relating to any acts of child sexual or physical abuse.

Superintendent Henderson ‘asked for special favours’

Superintendent James Paterson Henderson was transferred to Parramatta Girls in early 1961, but left again after around 18 months.

Witness RN gave evidence that Henderson gave her ‘special jobs’ and asked her to perform ‘special favours’.¹¹⁷ She never had sex with him but he made her do ‘other things’.¹¹⁸

RN said:

The sexual abuse was bad but I was programmed. I knew what I had to do to survive, to get out and to make life as easy as possible while in there.¹¹⁹

As with Gordon, the Royal Commission has not found any documents to suggest action was ever taken against Henderson for these alleged offences. He was transferred to the Ormond Training School in 1962.

Superintendent Greenaway reportedly abused girls at two training schools

Superintendent Noel Greenaway worked at Parramatta Girls in the mid-1960s before he too moved to the Ormond Training School.

Ms Chard gave evidence that Greenaway would occasionally grab her and try to grope her. She said that he once entered the storeroom where she was working, pushed her over a bag of potatoes and pulled her pants down. When she resisted, he masturbated and ejaculated on her.¹²⁰

Ms Farrell-Hooker spoke about her time at the Ormond Training School in 1971 before she went to Parramatta. She stated that she was sexually abused by Greenaway there.¹²¹

Again, the Royal Commission has not been able to find any documents that suggest action was taken against Greenaway for child sexual abuse.

Superintendent Mayhew was said to have severely assaulted many girls

Superintendent Percival Edwin Mayhew ran Parramatta Girls for much of the 1960s.

Ms Mulquiney gave evidence that he was the head of the home:

He ruled the roost. He was a really big man, he was a bit like a hawk, he was very imposing and scary and you just absolutely knew that if you had to go and see him, you were in the biggest trouble under the sun.

She said that she once threatened to wet herself because a female officer refused to give her a toilet break. When she was sent to Mayhew for insubordination, he punched her in the eye.¹²² After the assault, she was not allowed visitors and her parents were told that she did not have any privileges because she had been misbehaving.¹²³

Ms Kitson also observed that Mayhew was 'a very scary man'.¹²⁴ One day, she told a welfare officer that she was being raped by other girls. Mayhew later smashed her in the face with a bunch of keys and locked her in isolation for 21 days.¹²⁵

Ms Robb spoke of Mayhew punching her under the ribs or around the head with his fist, kneeling her in the body and watching her stand naked under a cold shower making snide remarks. She stated that Mayhew and Gilford beat her with her hands tied behind her back and smashed her face into a sink in the shower block. They then told her to clean up the mess and threw her in isolation for 48 hours.¹²⁶

Ms Luke gave evidence that Mayhew used to take her into his office. He told her 'a lot of things can be done if you just cooperate'. He once put his finger inside her vagina, then masturbated and ejaculated.¹²⁷

Ms Chard said that Mayhew and Gilford beat her while she was in the isolation cell:

They bashed me with their hands and feet. They kicked and punched me. They bounced me off every wall ... I was bleeding from the ears. I was knocked unconscious and I urinated on myself. Later that night, Percy Mayhew came back in my cell and raped me.¹²⁸

The Royal Commission has found no documents that show Mayhew was ever reported, disciplined or charged relating to these alleged offences.

Superintendent Monaghan faced an inquiry for his abuse

Superintendent Denis Jerome Monaghan followed Mayhew as head of Parramatta Girls in 1971.

Ms Farrell-Hooker gave evidence that Monaghan would take girls down to the dungeon or to an isolation cell where he would 'rape and bash' them.¹²⁹

Ms Powell reported that Monaghan and Gilford sexually assaulted her in the dungeon. She said the two men would always act together: one man would hold her down and the other would put his hands inside her. This happened around five times, and they once inserted a broomstick inside her.¹³⁰

Unlike the other superintendents, Monaghan faced an inquiry into his conduct, although no witnesses from the public hearing were involved. In June 1973, inmates at Parramatta Girls complained that he and Gilford had been physically assaulting them and subjecting them to isolated punishment, which went against the regulations.

The NSW Public Service Board recommended five charges of misconduct and six counts of disgraceful or improper conduct. Monaghan was suspended and soon resigned. For more on Gilford, please see section 3.3.

Documents that the State of New South Wales produced under notice record this inquiry.¹³¹ But the Royal Commission has not been able to find any documents that show Monaghan was ever the subject of a criminal charge for child sexual abuse.

3.3 Deputy superintendents and Hay's Acting Manager

Deputy Superintendent Crawford reportedly assaulted two girls

Witnesses at the public hearing also told us about physical and sexual abuse by deputy superintendents at Parramatta Girls. The first was Deputy Superintendent Donald Crawford, who worked there in the late 1950s.

Ms Hillery gave evidence about her time at the institution between March and December 1958.¹³² She said that a man, whose name she thinks was Crawford, repeatedly bashed and raped her over the eight months she was committed to Parramatta Girls. She recalled 'Crawford' putting his penis in her mouth 'with poo on it'. She stated that he also hit her over the head with a set of keys and threw her into the dungeon where he forced her to have oral sex.¹³³

Ms Hillery thinks her abuser's name was Crawford because 'that's the name that has just stayed with me all my life. When I think of Parramatta, I immediately think of Crawford.'¹³⁴

OA also gave evidence that Crawford groomed her and raped her many times. She said that Crawford used a grooming process and did not rape her straight away: 'It went slowly, over time. He kept building the incidents up to full penetration.'¹³⁵

Crawford resigned in August 1958. As with many of the superintendents we researched, the Royal Commission has not found any documents that show he was ever reported, disciplined or charged relating to child sexual and physical abuse offences.

Deputy Superintendent Johnston was found guilty of internal conduct charges

Deputy Superintendent Eric Charles Johnston was also at Parramatta Girls in the 1950s.

By 1961, information suggesting that he had an 'undesirable' association with a girl there had come to light in the NSW Public Service, according to documents the State produced under notice.

The matter was referred to NSW Police and an internal investigation was then carried out. No witnesses in this public hearing were involved in that inquiry.

Johnston was found guilty of three internal conduct charges but never charged by the police.¹³⁶ He was suspended in 1961 and later dismissed from the Public Service.

Deputy Superintendent Ward allegedly abused Ms Campbell

Next followed Deputy Superintendent Ronald Charles Ward, who was at Parramatta Girls for around a year.

Ms Campbell gave evidence that, like Superintendent Gordon, Ward abused her in the shower room, the donkey room and the dungeon. She gave evidence that, on one occasion, 'He got up swearing. There was some blood on me. There was blood on his thing.' Ward called out to a female officer and said, 'I think Coral got her period.' She was then locked in isolation for 24 hours.¹³⁷

Ms Campbell was not cross examined by Counsel representing Ward.

Ward was recommended for Ormond Training School and transferred there in November 1962. The Royal Commission has not found any documents to indicate that he was ever reported, disciplined or charged relating to child sexual abuse offences.

Deputy Superintendent Gilford was 'the worst abuser at Parramatta Girls'

In 1967, Deputy Superintendent Gordon Henry Gilford was transferred to Parramatta Girls.

Ms Luke gave evidence that 'the worst abuser at Parramatta Girls was Mr Gilford'. She was placed into the dungeon and raped on at least eight occasions by Gilford, including when she was pregnant.¹³⁸

Similarly, Ms McNally said she was indecently assaulted in the dungeon and punched when she was pregnant. She recalled Gilford as a 'horrible man'.¹³⁹

Ms Robb stated that she was made to strip naked by Gilford and Mayhew. She gave evidence that they once beat her with her hands tied and smashed her face into a sink.¹⁴⁰ Ms Chard also spoke of physical abuse by Gilford and Mayhew in the isolation cell.¹⁴¹

According to Ms Powell, it was Gilford and Monaghan who, together, sexually abused her in the dungeon on about five occasions: 'One would hold me down and the other one put his hands inside me.' They once put a broomstick inside her.¹⁴²

Ms Kitchener said that Gilford once 'had her' in the holding room after she had tried to run away. He said, 'You're not even worth spitting on', before bashing and raping her.¹⁴³

In 1973, allegations against Gilford and Monaghan came to the attention of the Department of Child Welfare and Social Services, and the department investigated.¹⁴⁴

The NSW Public Service Board found Gilford guilty of 16 counts of misconduct and 2 counts of disgraceful or improper conduct.¹⁴⁵ He was suspended from duty in June 1973 and resigned the following month.

The Royal Commission has not been able to find any documents to indicate that Gilford was ever charged with child sexual abuse offences.

Deputy Superintendent Valentine received a formal warning for his conduct

Frank Valentine came to Parramatta Girls as a relieving deputy superintendent in 1971.

Ms Farrell-Hooker gave evidence that Valentine raped her in the dungeon: 'He forced me to have oral sex with him and then full vaginal sex.'¹⁴⁶ At the public hearing, Counsel for Valentine put to Ms Farrell-Hooker that:

- she was mistaken about having been sexually abused by him
- over time, she had confused Valentine with Gilford and Monaghan.

However, Ms Farrell-Hooker did not agree with any suggestion that she had mixed the men up in her memory.¹⁴⁷ She stated that Valentine had been one of the main perpetrators of her sexual abuse.¹⁴⁸

Counsel for Valentine also questioned Ms Kitchener's evidence. Ms Kitchener said that Valentine and Gilford once grabbed her and threw her down three flights of stairs because she had not accrued enough points in the institution's points system, which was used to reward good behaviour. She also said that the two men 'raped [her] in the holding cell up the front'.¹⁴⁹ Counsel put to her that, over a long period of time, she had confused the identity of Valentine with that of Monaghan.

Ms Kitchener replied, 'I disagree totally because my memory ... of what happened to me has never left my head.'¹⁵⁰ She said that Valentine 'had a black beard when he was younger' and that Monaghan 'was an older fellow, older than Valentine'.¹⁵¹

In earlier evidence, she stated that Monaghan 'didn't do nothing to me. I probably got a slap across the face once or twice by him. But personally to me, he didn't do nothing to me in that way. He didn't rape me.'¹⁵²

In June 1973, the NSW Public Service Board's inquiry into Monaghan and Gilford received statements that suggested Valentine had physically abused girls, including slapping one across the face and hitting two others with his fist.¹⁵³

This prompted an investigation into his conduct, but he denied the allegations. The board found that, without corroboration, there was not enough evidence to charge him. However, it found that he:

- had witnessed Gilford and Mayhew's assaults
- must have been aware of other assaults and punishments that were contrary to law
- took no action.

No witnesses in this public hearing were involved in that inquiry.¹⁵⁴

Valentine was given a formal warning and transferred to the Daruk Training School in August 1973. As with Gilford, the Royal Commission has not been able to find any documents that show Valentine was ever charged over these alleged offences.

Chief Instructor Maxwell was investigated for abuse at the Hay Institution

The public hearing also heard evidence about one perpetrator from the Hay Institution. Chief Instructor Alexander William Maxwell was the Acting Manager in July 1967.

Ms Kitchener gave evidence that Maxwell bashed and raped her repeatedly. She spoke of one occasion where he kicked and knocked her to the floor, before bashing her head into the wall. He then picked her up and belted her with a hose. She could not walk properly after the assault.¹⁵⁵

In 1973, according to documents that the State produced under notice, allegations arose that Maxwell had physically assaulted five girls, including:

- hitting or slapping across the face
- hitting around the face and head
- pulling hair
- kicking.

He was suspended and the NSW Public Service Board recommended that an inquiry take place. No witnesses in this public hearing took part in that inquiry,¹⁵⁶ and Maxwell resigned before the process was complete.¹⁵⁷

The Royal Commission has not found any documents to suggest that Maxwell was ever charged with child sexual abuse.

4 Reporting of abuse

Key points

This section describes the difficulties that inmates of Parramatta Girls and the Hay Institution faced in reporting abuse, both at the time and in later years. Many felt that there was nobody to tell, and those who did speak out often received an inadequate response. More recent attempts to seek justice have also failed because most of the alleged perpetrators have now died.

4.1 Difficulties in reporting at the time

Girls feared not being believed or being punished

Most former inmates who gave evidence said that they did not report the abuse at the time.

Some felt nobody would believe them.¹⁵⁸ Some felt too ashamed because they thought they were 'disgusting' or 'bad'.¹⁵⁹ Others said they were frightened of being punished for complaining, or they feared the alleged perpetrators would seek retribution.¹⁶⁰

For example, RN gave evidence that girls would be sent to the Hay Institution if they were caught talking about the abuse in the dormitory. She said that the fear of being sent there discouraged her from discussing Henderson's abuse.¹⁶¹ Ms Mulquiney also said she was told that she would lose privileges or be transferred to Hay if she reported the abuse.¹⁶²

Ms Farrell-Hooker said that she submitted to the abuse because she did not want to be bashed again. At times she fought the perpetrators, but the more she fought, the worse it became. She said she conformed to get it over with.¹⁶³

Meanwhile, Ms Powell stated that Gilford and Monaghan threatened that they would find her and make her disappear if she spoke out.¹⁶⁴

Access to external welfare officers was limited and controlled

Witnesses also said that there was nobody to report the abuse to.¹⁶⁵

According to Ms Farrell-Hooker, when external social or child protection workers visited, the superintendent told girls to keep their mouths shut and say that everything was fine. She said they were only allowed to talk about the weather, not the physical abuse, the sexual abuse or the denial of food.¹⁶⁶

Ms Kitson said that girls were routinely locked in isolation when welfare officers were visiting, to stop those officers seeing or receiving reports of abuse.¹⁶⁷

Ms Robb said that her file records that independent people who came to visit her, such as a child welfare inspector and a psychiatrist, could not see her 'because she was in isolation or segregated detention'.¹⁶⁸

She said that even if the girls were allowed to speak to welfare officers or other staff, they were never asked any questions like ‘Why are you sick?’ or ‘Why are you here?’¹⁶⁹ The answers to these questions might have indicated that the girls were being abused.

Ms Stone gave evidence that the women who worked at the Hay Institution were not allowed to talk about anything. They were not allowed to complain about the treatment of girls and they were not listened to. She said they had no power as female officers.¹⁷⁰

Inmates felt that other staff must have been aware of the abuse

Numerous women said that, although they did not report the abuse, they believed other staff at the institutions must have been aware of what was happening:

Witness	Evidence
Ms Kitchener	A female officer once attended to Ms Kitchener after Maxwell had sexually and physically abused her at Hay. The officer said, ‘You need to report this when you get back to Parramatta,’ but did nothing to help her. ¹⁷¹
Ms Graham	The day after an attempted sexual assault by other inmates at Parramatta Girls, Ms Graham visited the matron with black eyes and a split lip. The matron said, ‘You can’t say anything because you will only get it again.’ ¹⁷²
Ms Patton	A female officer saw Gordon sexually abusing her in the dungeon. The officer shone a light on Gordon and he scrambled to his feet and yelled, ‘Get back in the cell.’ The officer then burst into tears, wrapped Ms Patton in a blanket and took her to the hospital block. Ms Patton was attended to by a nursing sister and a doctor but nobody supported her, nobody said anything and nobody did anything. ¹⁷³
Ms Farrell-Hooker	A female officer would collect Ms Farrell-Hooker from the isolation cell and take her for a shower after she was abused. The officer would then force Ms Farrell-Hooker’s hand into her vagina to clean out ‘the junk’. This would continue until she was bleeding so that she would not get pregnant. ¹⁷⁴
Ms Hillery	The sewing teacher had a soft spot for Ms Hillery. While she could not recall if she discussed the abuse with this officer, she believes that the officer would have known what was happening to her. ¹⁷⁵
OA	When Crawford was on night duty, other officers would take OA to Crawford’s bedroom. ¹⁷⁶ She also miscarried while she was at Parramatta Girls and was taken to the sick bay, but the doctor did not comment on her condition. ¹⁷⁷
Ms Kitson	One of Ms Kitson’s chores meant she was locked in the dormitory with her abusers, so she asked to be assigned a different, supervised chore. The officers refused her request, even though they knew why she was asking. They did not care. ¹⁷⁸

4.2 Responses to reports at the time

Three witnesses who reported the abuse were not helped

Five witnesses said that they did report their abuse to a person in authority at the time, but three received no help.

Ms Kitson gave evidence that she told a visiting welfare officer she had been abused by other girls in the dormitory. She said the officer then reported this to Mayhew, who struck her in the face with a bunch of keys and sent her to isolation for 21 days. This was roughly the time it took for the bruising to subside.¹⁷⁹

Ms McNally said she told a female officer that something needed to be done about Gilford: 'He's a bit of a proper and he tends to slip his hands down our pants when we go to the bathroom.' She said the response was: 'I don't know what we can do about it.'¹⁸⁰

OA reported Mr Crawford's abuse to the police when she was 16. She said that the interviewing officers were sympathetic but ultimately said:

We can't do anything. It's called a hot potato. It's a government institution and you have been made a ward of the state and they are supposed to be the ones [who look after you].

The police then took her back to Parramatta.¹⁸¹

Only two witnesses were removed from Parramatta Girls

Only two witnesses said they were removed from danger when they reported the abuse.

Ms Hillery said that when a father of a friend of hers visited her at Parramatta Girls, he asked about the bruises on the side of her face and head. She told him about the abuse and, two days later, she was released.¹⁸²

Ms Patton said that government officials visited her in Long Bay Gaol in 1961, after the riots at Parramatta Girls. She told them she would not go back to Parramatta because she was being raped. The officials told her that Gordon and Johnston were gone, and nobody would interfere with her. She then negotiated her release from the State's care, on the condition that she helped to end the riots.¹⁸³

4.3 Later reporting

Some witnesses later reported their abuse but no action was taken

Even after leaving Parramatta Girls or the Hay Institution, former inmates found it hard to report their abuse. Ms Chard, for instance, gave evidence that she did not tell anyone because her aunts knew Gilford.¹⁸⁴

Ms Robb told her mother about it when she was released, but her mother advised her to leave it alone for fear of being punished. Ms Robb did not speak of it again until she was 57.¹⁸⁵

Ms Kitson stated that she first shared her experience with her husband when she was 20 or 21, but he did not believe her. She also told her psychiatrists when she was 24, but again was not believed.¹⁸⁶

OA gave evidence that she told police officers about Crawford's abuse when she was in her early 20s, but they laughed and said, 'Oh, yes, we have heard about him. He's working in Adelaide now.' They did nothing.¹⁸⁷

Ms Campbell first reported the abuse to the ABC *Stateline* program in 2003, 43 years after it happened.¹⁸⁸ She said that she never went to the police because she thought nobody would believe her.¹⁸⁹ When she first gave her statement to the Royal Commission, she was still scared that nobody would believe her.¹⁹⁰

Ms Mulquiney said she was disclosing her abuse for the first time to the Royal Commission, at 59 years old.¹⁹¹

Nobody was ever arrested or convicted

Two witnesses gave evidence that they had complained to the police, but no arrests or convictions followed:

- Ms Graham reported Gordon's abuse to the Campbelltown police in 1998, but she was told that Gordon had passed away so there was nothing they could do.¹⁹²
- Ms Robb reported Mayhew and Gilford smashing her teeth out to the Queanbeyan Police in 2006, but she was told the prosecution would not proceed because the perpetrators were either dying from cancer or had Alzheimer's disease.¹⁹³

In 1996, Ms Farrell-Hooker gave evidence to the Wood Royal Commission into the NSW Police Force. She also reported incidents of abuse at institutions other than Parramatta Girls to the police. But the police told her they could not find the perpetrators, some were dead and some were too old to prosecute. She said she thought the police had given up on her.¹⁹⁴

5 Effect of abuse

Key points

This section examines the impact of physical and sexual abuse on the former inmates of Parramatta Girls and the Hay Institution. Evidence described the devastating and long-lasting consequences for education, employment, health and family. Many women still live in fear, with traumatic flashbacks, and feel as though the pain will never go away.

5.1 Impact on education and employment

On release, girls received no State support

Several witnesses gave evidence that they received no support from the State when they left Parramatta Girls.¹⁹⁵ Some became homeless.¹⁹⁶ Some turned to prostitution.¹⁹⁷

OA, for example, said she left Parramatta Girls with nothing: 'No money. No clothes. Only what I wore.'¹⁹⁸ She said that she had no skills because she was only taught two things:

- how to use her sexuality to live
- that if she was good to men, she would be rewarded.¹⁹⁹

She was homeless and worked as a prostitute in Kings Cross to support herself.²⁰⁰

Ms Chard also stated that she ended up on the streets because she had nowhere to go.²⁰¹ She too moved to Sydney and worked as a prostitute in Kings Cross.²⁰²

Ms Stone gave evidence that when she left Parramatta Girls in 1972, she committed armed robberies to support her family.²⁰³ She later started cooking methamphetamine, for which she received a suspended sentence in 1992.²⁰⁴

She said that the effect of institutionalisation was that she 'went in an innocent girl' but left a dangerous and uncontrollable criminal.²⁰⁵

With no education, they struggled to adapt to life outside the institutions

Witnesses also said that they received no education at Parramatta Girls or the Hay Institution.²⁰⁶ They were not taught basic competencies, such as reading and writing.²⁰⁷

Ms Stone believes her education was stolen from her.²⁰⁸ Ms Kitchener said she will always wonder what she could have become because she was deprived of an education.²⁰⁹

OA gave evidence that, because she received no education, she was totally unprepared for life outside Parramatta Girls. She did not know where to live or how to get a job.²¹⁰

Employment prospects were limited and many now receive a pension

Those witnesses who did find jobs often struggled to maintain them because of their experiences as children at the institutions.²¹¹ Some found reporting to authority difficult.²¹² Others were only given work as cleaners.²¹³

Many also discovered that their association with Parramatta Girls affected their reputation and employment prospects. Ms Patton, for one, feared employers learning that she had been there and this greatly limited her job opportunities.²¹⁴

RN applied for a job at the Rozelle Mental Institution when she was about 18, but was not hired because she had to say that she had spent time at Parramatta Girls. After that, she did not discuss her time there because of the shame associated with institutionalisation.²¹⁵

In the 1970s, Ms Powell found work at Murray Brothers in Parramatta. But one day, the police came to hand her a summons to appear at a public inquiry into Parramatta Girls. Her employers thought she was a criminal so she was fired. The inquiry never went ahead.²¹⁶

Nine witnesses told us that they now receive a disability or other pension.²¹⁷ Some have no superannuation, no major assets, no financial savings and no private health insurance.²¹⁸

5.2 Impact on mental and physical health

Former inmates still face many psychological issues

All the former inmates gave evidence that their mental health has suffered because of the abuse. Almost all have considered or attempted suicide at least once.

Witness	Evidence
Ms Hillery	Ms Hillery has ongoing psychological trauma, including problems with her sex life and with her bowels. The smell of faeces affects her and she dreads using a toilet that is not her own. She suffers from flashbacks, but she has never had counselling for fear that it will drag up even worse memories that she has repressed. She believes the sadness will never go away. ²¹⁹
OA	OA is still burdened by the fear of Parramatta Girls. She does not trust men and her experiences have severely affected her self-worth. She vomits when she thinks about the abuse and feels she has been left 'with a legacy that will never go away'. ²²⁰
Ms Graham	Ms Graham feels like she has been in prison since she left Parramatta Girls. She does not trust anyone and has nightmares about Superintendent Gordon. ²²¹
Ms Kitson	Ms Kitson has had suicidal thoughts because she could not talk about her experiences. She believes that people do not want to know about what happened. She fears people and does not go out. ²²²

Witness	Evidence
Ms Patton	<p>Ms Patton has been claustrophobic since Parramatta Girls and fears closed doors. She is a nervy person 'who watches everything' and walks close to walls so people cannot approach her from behind.</p> <p>The sound of keys rattling reminds her of Superintendent Gordon.²²³</p>
RN	<p>RN has had ongoing issues with sex. Talking about certain sexual positions with her first husband would make her feel ill.</p> <p>Locked doors trigger bad memories and she will not go to venues like clubs as she cannot see a way to get out.</p> <p>Now in her 60s, the impact of the abuse still takes over her life.²²⁴</p>
Ms Powell	<p>Ms Powell has suffered depression throughout her life and has needed medication for it.²²⁵</p>
Ms Chard	<p>Ms Chard has nightmares that are only cured by heavy medication.</p> <p>She has been diagnosed with post-traumatic stress disorder.²²⁶</p>
Ms Mulquiney	<p>Ms Mulquiney suffers from traumatic flashbacks and has depression, with no self-confidence or self-esteem.</p> <p>She does not trust anyone and does not take criticism well.</p> <p>Medical tests make her anxious and she does not like being examined by male doctors.²²⁷</p>
Ms Farrell-Hooker	<p>Ms Farrell-Hooker was committed to a psychiatric hospital after attempting suicide. She has self-mutilated to relieve the pain.²²⁸</p>
Ms Stone	<p>Ms Stone has been diagnosed with a post-traumatic stress disorder.²²⁹</p>
Ms McNally	<p>Ms McNally has had a psychological breakdown, she has a dissociative disorder, and she sees a psychologist.</p> <p>She does not trust anyone. She cannot handle anyone asking her for her name, which stops her getting a passport.</p> <p>She cannot cope with guests in her house, and she cannot touch people.²³⁰</p>
Ms Robb	<p>Ms Robb's adult life is still encased in shame, guilt and a lack of self-worth. She has nightmares, she is claustrophobic and she finds it difficult to relate to people because she feels that she is different.</p> <p>She has been diagnosed with dissociative states and a post-traumatic stress disorder. She has received intensive counselling.²³¹</p>
Ms Kitchener	<p>Ms Kitchener suffers from manic depression and has been diagnosed with borderline multiple personality disorder. She has been admitted to mental institutions over the years.²³²</p>
Ms Campbell	<p>Ms Campbell is still troubled by the number 11, her number at Parramatta Girls. She continues to have flashbacks and horrible memories.²³³</p>
Ms Luke	<p>Ms Luke has not had any lasting relationships and could not be a proper sexual partner for her husband. She considers sex as a filthy act: she must clean herself afterwards and often vomits.²³⁴</p>

Their physical health has also suffered

Witnesses also said that they suffer from ongoing physical impacts.

Ms Chard said that her body 'is worn out before its time' from the hard labour at the Hay Institution.²³⁵ She has metal knees, a bad heart, a twisted back and broken bones in her feet.²³⁶ She added that she cannot hear properly because Gilford used to punch her ears until they bruised.²³⁷

Ms Farrell-Hooker gave evidence that she suffered 10 miscarriages because of the stress, trauma and bashings she received as a State ward. She reported that her doctor had told her that she had a lot of scarring inside her vagina, and she attributed this to the sexual abuse she suffered as a child.²³⁸

Ms Stone believes she contracted hepatitis C from a blood transfusion she had at Parramatta Girls.²³⁹ She stated that she now has diabetes and is being tested for sclerosis of the liver.²⁴⁰

5.3 Impact on families and communities

Marriages and family relationships have been affected

Several witnesses gave evidence that they have found it hard to maintain relationships. Some have struggled with their marriages.²⁴¹ Others have been with abusive partners.²⁴²

Ms Farrell-Hooker also spoke of her relationship with her parents. She said it took her six years to find them after being released from care, and she had trouble fitting back into her family:

The bond had been broken between me and my mother, which remained to the day she died. We were never mother and daughter again.²⁴³

Witnesses feel they have been poor role models for their children

Relationships with children have also suffered.

For Ms Kitson, her children were raised by her parents to avoid them being taken into care. She said she was unable to love them as they deserved and has only recently shared her story with them.²⁴⁴

Ms Powell said that she was raped as a 17-year-old and had a child who was taken away by the welfare department.²⁴⁵ She does not believe that she was a good mother to her other children. At one stage, she gave them to the Red Cross because the family was homeless and she did not want them to end up with child welfare.

Ms Robb also had a child removed from her when she was 18, but she was reunited with him in 2006.²⁴⁶ She said that her abuse has affected her family too, as they have struggled with her range of emotions and her fears.²⁴⁷

Ms Kitchener gave evidence that she does not have a relationship with some of her children and believes they hate her. She thinks that she was not a good role model and did not have the necessary parenting skills. She said the abuse she suffered has affected all of them: 'Because of the generational effect from me, it's gone on to them and they've both got mental health problems.' She also reported that her children do not believe her when she tells them what happened to her as a child.²⁴⁸

Finally, Ms Graham stated that her children and grandchildren have suffered emotionally and financially because of the abuse she suffered in Parramatta Girls.²⁴⁹

Some have been isolated from their Aboriginal community

Six of the witnesses who gave evidence to the Royal Commission identify as Aboriginal.²⁵⁰

Ms Farrell-Hooker said that being sent to institutional care affected her Aboriginality. She said that she was isolated from her culture and lived in two worlds: 'my community, which I lost, and the white man's world.' Her siblings call her 'Gubba Aboriginal', meaning that she is black on the outside and white on the inside.²⁵¹

Ms Farrell-Hooker suggested that if Aboriginal children are put into care, they should grow up with Aboriginal people because only they know the stories of other Aboriginal people.²⁵²

6 Redress

Key points

This section describes how only two of the former inmates who gave evidence have received compensation from the State of New South Wales. Many have tried to bring civil claims but failed because too much time has passed. The State has no schemes to provide redress to those who were abused or neglected in its care, although it is now reportedly considering its options. The Royal Commission is also investigating redress as part of our inquiry.

6.1 Compensation and civil claims

Two witnesses have received compensation

Only two of the 16 former inmates of Parramatta Girls or the Hay Institution who appeared at the public hearing have received compensation from the State of New South Wales for the abuse they suffered at those institutions:

- Ms Patton received \$37,500.²⁵³
- Ms Robb received \$10,000.²⁵⁴

A third witness, Ms McNally, received \$125,000 in compensation for abuse suffered in foster care, but this did not relate to her time at Parramatta Girls. She said that she was advised not to put in a claim against the Department of Community Services because ‘no-one ever wins against them’.²⁵⁵

Civil claims have failed because of the statute of limitations

Some witnesses said that they had tried to start civil claims for compensation against the State. However, these claims did not go ahead, mainly because of the *Limitation Act 1969* (NSW) and the cost of litigation.

Ms Kitchener said she approached solicitors about making a claim in 1999. They reportedly told her they would not take on a historical case because it was too long and would go on for two years. They said the funding had run out and they would need a million dollars to keep it going.²⁵⁶

Ms Patton said she contacted Gerard Malouf & Partners in 2005 and started a claim. Until then, she felt she could not face talking publicly about her experiences as she was disempowered and ashamed. She said that her claim eventually failed because it was outside the statute of limitations on child sexual abuse and she could not afford the court costs to continue to trial.²⁵⁷

Ms Kitson gave evidence that she met with LHD Lawyers in 2009 to discuss a claim. However, the lawyers never returned her calls and told her they had lost her files, before then returning them to her.²⁵⁸

A group claim has also failed

In 2007, Gerard Malouf & Partners represented a group of around 40 plaintiffs in a claim against the State. The group sought compensation for abuse sustained in the State's care. Ms Chard and Ms Robb were both involved in this claim.

However, it never went ahead because the lawyers advised that it would be unsuccessful under the statute of limitations.²⁵⁹ Ms Robb also reported that the government's solicitors warned another witness that she would be liable for \$120,000 in costs if she gave evidence.²⁶⁰

Ms Stone said she was contacted by Gerard Malouf & Partners to join a 2007 class action against the State relating to the Hay Institution. However, her file was transferred in 2008 and she could not get in contact with her new lawyer.²⁶¹

Ms Stone then contacted Shine Lawyers in 2012, but they told her that she could not file a claim as her limitation period had closed.²⁶² She stated that she has not applied for victims compensation because she was told that the perpetrator had to be charged with a crime first.²⁶³

Royal Commission is considering the effectiveness of civil litigation

Ms Patton told the Royal Commission that there should be no statute of limitations on child sexual abuse and victims should not have to pay court costs in advance to prove their case.²⁶⁴

The Royal Commission is considering the effectiveness of civil litigation as a mechanism for providing redress or compensation to victims and survivors.

6.2 Survivors' views on redress

Some would like the State to pay for health costs and funerals

Many of the former inmates gave evidence about forms of redress that would help them.

Ms Robb said she would like the State to introduce a redress scheme similar to one in Western Australia. She also said that there should be another scheme to pay for the funerals of those who have no family, savings, superannuation or homes. Further, she suggested there be a gold card like Vietnam veterans receive, to cover medical costs because many former State wards have health problems.²⁶⁵

She stated that the bodies of people from institutions are worn out because they:

- slept on cement, with nothing under their knees
- did not have proper blankets or proper food
- lived amongst asbestos, scrubbing away at it.²⁶⁶

Ms Campbell gave evidence that she does not want monetary compensation as 'it can't bring back that little girl that I was looking for, but could not find'.

Rather, she would like the State to pay for her funeral, and a wake for her friends and family. She would also like a headstone that acknowledges that she was an innocent girl and not the ‘bad girl’ that her perpetrators tried to shame her into believing she was.²⁶⁷

Others seek opportunities

Ms Luke stated that all she wants now is a chance to set up a home on the south coast near her natural father’s relatives. She has recently established contact and is receiving support from them.²⁶⁸

Ms Mulquiney said she had never previously thought of seeking compensation, but that it might help some former inmates: ‘We haven’t been able to have the life that we could have had. We haven’t been able to realise our potential.’²⁶⁹

Ms Graham said that she would have liked the State to help her look after her boys, so they did not have to go into care.²⁷⁰

Several witnesses also spoke about the importance of being able to access files and memorialise the site.²⁷¹ For example, Ms Campbell said she had tried to return to the Parramatta Girls site recently but was not allowed to enter, even though she explained that she wanted to share what had happened to her there with her family. She said it is important for the site to be preserved, so that she and others can go back there with family.²⁷²

Government apologies have not been enough for many

Witnesses also told the Royal Commission about their response to the formal apologies that the federal and state governments have made.

Ms Chard found the (then) Prime Minister’s apology to Forgotten Australians ‘moving’.²⁷³

Ms Mulquiney said that it made a big difference to her:

The apology was someone coming out and acknowledging that it was wrong, that things had been covered up for so many years and that the things at Parramatta Girls actually did happen.²⁷⁴

However, others did not find the apologies a positive experience.

Ms Kitson, for instance, thinks that they are ‘not worth the paper they are written on’ if the people apologising do not know what they are sorry for. She said that ‘if they provided more explanations and did something to let people know why they were saying sorry’, the apologies would mean more.²⁷⁵

Ms Robb attended Parliament House for the Prime Minister’s apology.²⁷⁶ But she commented that both it and the State’s apology mean nothing to her.²⁷⁷ She questioned what an apology is worth when the Alliance of Forgotten Australians, of which she is a part, has to ‘crawl on its belly to get anything done’.²⁷⁸

6.3 Action to improve redress schemes

Department of Premier and Cabinet is ‘looking at’ redress options

At the public hearing, the State of New South Wales acknowledged that:

- there had been failings in the past
- in 2005 and 2009, apologies were made on its behalf to those who suffered in institutional care.²⁷⁹

To date, the State has not set up any schemes to provide redress to these survivors. This is in contrast to Queensland, Tasmania, Western Australia and South Australia, which all have redress schemes of some kind.

Valda Ruis, the Chief Executive of Juvenile Justice NSW, gave evidence that she believed the Department of Premier and Cabinet is currently ‘looking at’ a redress scheme. However, she could not give any further details apart from noting that Juvenile Justice had been asked to make a submission on the topic.

Ms Ruis said that she didn’t know if ‘money itself is the answer’, but felt the women who gave evidence ‘need assistance in different forms and different ways’. She hoped that the question of adequate and appropriate redress will form ‘part of the brief which will come out of the Royal Commission’.²⁸⁰

Kate Alexander, Executive Director at the Office of the Senior Practitioner in the Department of Family and Community Services (FACS) also gave evidence. In her opinion, it is important that victims of abuse in State care receive financial compensation.²⁸¹ She was reassured to know that the NSW Government is looking at redress options. However, she had not seen any documents and said, ‘What that involves is outside my realm of knowledge or expertise.’²⁸² She also referred to two existing services:

Service	State involvement	Role
Joint Investigation Response Team	FACS, NSW Police and NSW Health	<ul style="list-style-type: none"> • Has helped victims of sexual abuse in the areas of safety, justice and recovery
Wattle Place	FACS funding (run by Relationships Australia)	<ul style="list-style-type: none"> • Supports Forgotten Australians, former orphans and people from children’s homes, institutions and foster care between 1920 and 1990 • Helps those who are leaving or have left care • Offers counselling, life skills, drop-in centres, social activities and legal advice²⁸³

Royal Commission has released two issues papers

The issue of redress is a significant one for the Royal Commission. We have already released three issues papers on related topics:

Topic	Issues	Date
Civil litigation	<ul style="list-style-type: none"> • The effectiveness of current systems in resolving claims relating to child sexual abuse in institutions • Possible reforms to improve their effectiveness 	Sep 2013
Government or institutional redress schemes	<ul style="list-style-type: none"> • The role these schemes should have in providing redress for victims of child sexual abuse in institutions • The features they need to be effective for victims, governments and institutions 	Apr 2014
Statutory victims of crime compensation schemes	<ul style="list-style-type: none"> • The role these schemes, which apply generally to all victims of crime, currently have in providing redress for victims of child sexual abuse in institutions • The role they should have in the future 	May 2014

The Royal Commission has received well over a hundred submissions. We are now considering them, and have begun to consult with many institutions and others with an interest through public forums, public hearings and further research. We will report on these issues by June 2015.

7 Systemic issues

Key points

The evidence in this case study highlights the particular vulnerability of children to sexual abuse while in the care of the State. The Royal Commission is continuing to inquire into systemic issues that arise from the current model of out-of-home care.

7.1 Our focus on systemic issues

We are examining systemic issues in several ways

The Royal Commission must make findings and recommendations to better protect children against sexual abuse and alleviate the impact of abuse when it occurs. In carrying out our work, we are directed to:

- focus on systemic issues
- be informed by an understanding of individual cases.

All our work is contributing to our understanding of the systemic issues, including public hearings, private sessions, written accounts and research. Our research includes dedicated projects, roundtables and submissions on issues papers.

Systemic issues guide public hearings and consultation

When deciding whether to hold a public hearing such as this one, we consider whether it will help us to understand systemic issues and give us an opportunity to learn from previous mistakes. This provides our findings and recommendations with a secure evidence base.

As the Royal Commission moves forward, our public hearings and consultation processes must focus on systemic issues that affect how institutions respond to child sexual abuse.

We will address the following issues to fulfill our Terms of Reference:

- the scope and impact of child sexual abuse
- prevention of abuse
- reporting and responding to abuse
- regulation and oversight of institutions working with children
- compensation and redress schemes
- the criminal justice system.

We must also examine systemic issues across the full range of institutions. This includes both the different types of institutions and the different entities that operate them.

7.2 Issues emerging from this case study

Children in State care are particularly vulnerable

The evidence in this case study highlights the particular vulnerability of children to sexual abuse while in the care of the State.

It is an important part of the Royal Commission's work to ensure that the physical and sexual abuse we learned about in the public hearing is not repeated.

In September 2013, we released an issues paper on preventing the sexual abuse of children in out-of-home care. We received dozens of public submissions in response, and held a roundtable discussion last April.

We are reviewing out-of-home care and juvenile justice

It is clear from the submissions, research and evidence we have collated that the model of out-of-home care in New South Wales has changed significantly in the time since Parramatta Girls and the Hay Institution were open.

However, we will be examining the systemic issues that arise from the current system of out-of-home care through:

- issues papers
- public forums
- future case studies.

Redress schemes are also being investigated

As we explored in section 6, we will also continue to look at redress schemes for people who have been physically or sexually abused as children in State care.

APPENDIX A: Terms of Reference

Letters Patent

ELIZABETH THE SECOND, by the Grace of God Queen of Australia and Her other Realms and Territories, Head of the Commonwealth:

TO

The Honourable Justice Peter David McClellan AM,
Mr Robert Atkinson,
The Honourable Justice Jennifer Ann Coate,
Mr Robert William Fitzgerald AM,
Dr Helen Mary Milroy, and
Mr Andrew James Marshall Murray

GREETING

WHEREAS all children deserve a safe and happy childhood.

AND Australia has undertaken international obligations to take all appropriate legislative, administrative, social and educational measures to protect children from sexual abuse and other forms of abuse, including measures for the prevention, identification, reporting, referral, investigation, treatment and follow up of incidents of child abuse.

AND all forms of child sexual abuse are a gross violation of a child's right to this protection and a crime under Australian law and may be accompanied by other unlawful or improper treatment of children, including physical assault, exploitation, deprivation and neglect.

AND child sexual abuse and other related unlawful or improper treatment of children have a long-term cost to individuals, the economy and society.

AND public and private institutions, including child-care, cultural, educational, religious, sporting and other institutions, provide important services and support for children and their families that are beneficial to children's development.

AND it is important that claims of systemic failures by institutions in relation to allegations and incidents of child sexual abuse and any related unlawful or improper treatment of children be fully explored, and that best practice is identified so that it may be followed in the future both to protect against the occurrence of child sexual abuse and to respond appropriately when any allegations and incidents of child sexual abuse occur, including holding perpetrators to account and providing justice to victims.

AND it is important that those sexually abused as a child in an Australian institution can share their experiences to assist with healing and to inform the development of strategies and reforms that your inquiry will seek to identify.

AND noting that, without diminishing its criminality or seriousness, your inquiry will not specifically examine the issue of child sexual abuse and related matters outside institutional contexts, but that any recommendations you make are likely to improve the response to all forms of child sexual abuse in all contexts.

AND all Australian Governments have expressed their support for, and undertaken to cooperate with, your inquiry.

NOW THEREFORE We do, by these Our Letters Patent issued in Our name by Our Governor-General of the Commonwealth of Australia on the advice of the Federal Executive Counsel and under the Constitution of the Commonwealth of Australia, the *Royal Commissions Act 1902* and every other enabling power, appoint you to be a Commission of inquiry, and require and authorise you, to inquire into institutional responses to allegations and incidents of child sexual abuse and related matters, and in particular, without limiting the scope of your inquiry, the following matters:

- a. what institutions and governments should do to better protect children against child sexual abuse and related matters in institutional contexts in the future;
- b. what institutions and governments should do to achieve best practice in encouraging the reporting of, and responding to reports or information about, allegations, incidents or risks of child sexual abuse and related matters in institutional contexts;
- c. what should be done to eliminate or reduce impediments that currently exist for responding appropriately to child sexual abuse and related matters in institutional contexts, including addressing failures in, and impediments to, reporting, investigating and responding to allegations and incidents of abuse;
- d. what institutions and governments should do to address, or alleviate the impact of, past and future child sexual abuse and related matters in institutional contexts, including, in particular, in ensuring justice for victims through the provision of redress by institutions, processes for referral for investigation and prosecution and support services.

AND We direct you to make any recommendations arising out of your inquiry that you consider appropriate, including recommendations about any policy, legislative, administrative or structural reforms.

AND, without limiting the scope of your inquiry or the scope of any recommendations arising out of your inquiry that you may consider appropriate, We direct you, for the purposes of your inquiry and recommendations, to have regard to the following matters:

- e. the experience of people directly or indirectly affected by child sexual abuse and related matters in institutional contexts, and the provision of opportunities for them to share their experiences in appropriate ways while recognising that many of them will be severely traumatised or will have special support needs;
- f. the need to focus your inquiry and recommendations on systemic issues, recognising nevertheless that you will be informed by individual cases and may need to make referrals to appropriate authorities in individual cases;
- g. the adequacy and appropriateness of the responses by institutions, and their officials, to reports and information about allegations, incidents or risks of child sexual abuse and related matters in institutional contexts;
- h. changes to laws, policies, practices and systems that have improved over time the ability of institutions and governments to better protect against and respond to child sexual abuse and related matters in institutional contexts.

AND We further declare that you are not required by these Our Letters Patent to inquire, or to continue to inquire, into a particular matter to the extent that you are satisfied that the

matter has been, is being, or will be, sufficiently and appropriately dealt with by another inquiry or investigation or a criminal or civil proceeding.

AND, without limiting the scope of your inquiry or the scope of any recommendations arising out of your inquiry that you may consider appropriate, We direct you, for the purposes of your inquiry and recommendations, to consider the following matters, and We authorise you to take (or refrain from taking) any action that you consider appropriate arising out of your consideration:

- i. the need to establish mechanisms to facilitate the timely communication of information, or the furnishing of evidence, documents or things, in accordance with section 6P of the *Royal Commissions Act 1902* or any other relevant law, including, for example, for the purpose of enabling the timely investigation and prosecution of offences;
- j. the need to establish investigation units to support your inquiry;
- k. the need to ensure that evidence that may be received by you that identifies particular individuals as having been involved in child sexual abuse or related matters is dealt with in a way that does not prejudice current or future criminal or civil proceedings or other contemporaneous inquiries;
- l. the need to establish appropriate arrangements in relation to current and previous inquiries, in Australia and elsewhere, for evidence and information to be shared with you in ways consistent with relevant obligations so that the work of those inquiries, including, with any necessary consents, the testimony of witnesses, can be taken into account by you in a way that avoids unnecessary duplication, improves efficiency and avoids unnecessary trauma to witnesses;
- m. the need to ensure that institutions and other parties are given a sufficient opportunity to respond to requests and requirements for information, documents and things, including, for example, having regard to any need to obtain archived material.

AND We appoint you, the Honourable Justice Peter David McClellan AM, to be the Chair of the Commission.

AND We declare that you are a relevant Commission for the purposes of sections 4 and 5 of the *Royal Commissions Act 1902*.

AND We declare that you are authorised to conduct your inquiry into any matter under these Our Letters Patent in combination with any inquiry into the same matter, or a matter related to that matter, that you are directed or authorised to conduct by any Commission, or under any order or appointment, made by any of Our Governors of the States or by the Government of any of Our Territories.

AND We declare that in these Our Letters Patent:

child means a child within the meaning of the Convention on the Rights of the Child of 20 November 1989.

government means the Government of the Commonwealth or of a State or Territory, and includes any non-government institution that undertakes, or has undertaken, activities on behalf of a government.

institution means any public or private body, agency, association, club, institution, organisation or other entity or group of entities of any kind (whether incorporated or unincorporated), and however described, and:

- i. includes, for example, an entity or group of entities (including an entity or group of entities that no longer exists) that provides, or has at any time provided, activities, facilities, programs or services of any kind that provide the means through which adults have contact with children, including through their families; and
- ii. does not include the family.

institutional context: child sexual abuse happens in an **institutional context** if, for example:

- i. it happens on premises of an institution, where activities of an institution take place, or in connection with the activities of an institution; or
- ii. it is engaged in by an official of an institution in circumstances (including circumstances involving settings not directly controlled by the institution) where you consider that the institution has, or its activities have, created, facilitated, increased, or in any way contributed to, (whether by act or omission) the risk of child sexual abuse or the circumstances or conditions giving rise to that risk; or
- iii. it happens in any other circumstances where you consider that an institution is, or should be treated as being, responsible for adults having contact with children.

law means a law of the Commonwealth or of a State or Territory.

official, of an institution, includes:

- i. any representative (however described) of the institution or a related entity; and
- ii. any member, officer, employee, associate, contractor or volunteer (however described) of the institution or a related entity; and
- iii. any person, or any member, officer, employee, associate, contractor or volunteer (however described) of a body or other entity, who provides services to, or for, the institution or a related entity; and
- iv. any other person who you consider is, or should be treated as if the person were, an official of the institution.

related matters means any unlawful or improper treatment of children that is, either generally or in any particular instance, connected or associated with child sexual abuse.

AND We:

- n. require you to begin your inquiry as soon as practicable, and
- o. require you to make your inquiry as expeditiously as possible; and
- p. require you to submit to Our Governor-General:
 - i. first and as soon as possible, and in any event not later than 30 June 2014 (or such later date as Our Prime Minister may, by notice in the *Gazette*, fix on your recommendation), an initial report of the results of your inquiry, the recommendations for early consideration you may consider appropriate to make in this initial report, and your recommendation for the date, not later than 31 December 2015, to be fixed for the submission of your final report; and

- ii. then and as soon as possible, and in any event not later than the date Our Prime Minister may, by notice in the *Gazette*, fix on your recommendation, your final report of the results of your inquiry and your recommendations; and
- q. authorise you to submit to Our Governor-General any additional interim reports that you consider appropriate.

IN WITNESS, We have caused these Our Letters to be made Patent.

WITNESS Quentin Bryce, Governor-General of the Commonwealth of Australia.

Dated 11th January 2013

Governor-General

By Her Excellency's Command

Prime Minister

APPENDIX B: Public Hearing

The Royal Commission	Justice Peter McClellan AM (Chair) Justice Jennifer Coate Mr Bob Atkinson AO APM Mr Robert Fitzgerald AM Professor Helen Milroy Mr Andrew Murray
Commissioners who presided	Justice Peter McClellan AM
Date of public hearing	26, 27, 28 February, 3 March
Legislation	<i>Royal Commissions Act 1902 (Cth)</i>
Leave to appear	State of New South Wales Fay Hillery Diane Chard Wilma Robb RN Lee Powell Dianne Graham Robyne Stone Mary Farrell-Hooker Coral Campbell Yvonne Kitchener Frank Valentine Noel Greenaway Ronald Ward
Legal representation	C Spruce, Counsel Assisting the Royal Commission J Gleeson SC and M England, instructed by I Knight and I Fraser, appearing for the State of New South Wales S Benson, instructed by P Kelso, appearing for RN, Fay Hillery, Diane Chard and Wilma Robb M McKenzie appearing for Lee Powell K Nomchong SC, instructed by D Jones and E Schalit, appearing for Frank Valentine, Ronald Ward and Noel Greenway P O'Brien appearing for Yvonne Kitchener K McGlinchy appearing for Robyne Stone, Mary Farrell-Hooker and Coral Campbell

D Kaiti appearing for Dianne Graham

Pages of transcript	431 pages
Summons to and documents	7 summons to attend issued under <i>Royal Commissions Act 1923</i> (NSW) producing 6,548 documents
Number of exhibits	24 exhibits consisting of 119 documents tendered at the hearing
Witnesses	<ol style="list-style-type: none"> 1 Witness OA Former Parramatta Girls resident 2 Witness RN Former Parramatta Girls resident 3 Fay Hillery Former Parramatta Girls resident 4 Dianne Graham Former Parramatta Girls resident 5 Wendy Patton Former Parramatta Girls resident 6 Robin Kitson Former Parramatta Girls resident 7 Wilma Robb Former Parramatta Girls resident/ the Hay Institution resident 8 Diane Chard Former Parramatta Girls resident/ the Hay Institution resident 9 Robyne Stone Former Parramatta Girls resident/ the Hay Institution resident 10 Jennifer McNally Former Parramatta Girls resident 11 Janet Mulquiney Former Parramatta Girls resident 12 Denise Luke Former Parramatta Girls resident 13 Lee Powell Former Parramatta Girls resident

- 14 **Yvonne Kitchener**
Former Parramatta Girls resident/
the Hay Institution resident
- 15 **Coral Campbell**
Former Parramatta Girls resident
- 16 **Mary Farrell-Hooker**
Former Parramatta Girls resident
- 17 **Kate Alexander**
Executive Director, Office of the Senior Practitioner,
Department of Family and Community Services
- 18 **Valda Ruis**
Chief Executive, Juvenile Justice NSW

Endnotes

- 1 Find & Connect Web Resource Project, *Parramatta Girls Training School (1946–1974)*, 2013, <http://www.findandconnect.gov.au/ref/nsw/biogs/NE01318b.htm> (viewed 19 September 2014).
- 2 Find & Connect Web Resource Project, *Parramatta Girls Training School (1946–1974)*, 2013, <http://www.findandconnect.gov.au/ref/nsw/biogs/NE01318b.htm> (viewed 19 September 2014).
- 3 *Child Welfare Act 1939* (NSW), s. 9(2).
- 4 P Quinn, 'Unenlightened Efficiency: the administration of the juvenile correction system in New South Wales 1905–1988', PhD thesis, University of Sydney, pp 215–217; with reference to M C Tenison-Woods, *A report on the Girls Industrial School Parramatta, NSW: A study in the principles and practices of child welfare administration*, Melbourne University Press, 1945, pp 62–66.
- 5 Find & Connect Web Resource Project, *Parramatta Girls Training School (1946–1974)*, 2013, <http://www.findandconnect.gov.au/ref/nsw/biogs/NE01318b.htm> (viewed 19 September 2014).
- 6 *NSW Government Gazette*, 1946, vol. 2, p. 1,847, <http://investigator.records.nsw.gov.au/entity.aspx?path=\agency\460> (viewed 19 September 2014).
- 7 B Boyle, 'The child welfare schools: recollections of these unique schools and the men and women who taught in them often under considerable difficulty', unpublished typescript, 1996, pp 73–74; Find & Connect Web Resource Project, *Parramatta Girls Training School (1946–1974)*, <http://www.findandconnect.gov.au/guide/nsw/NE01318> (viewed 19 September 2014); Exhibit 7-0008, Case Study 7, EXH.007.008.0001.
- 8 Exhibit 7-0007, Case Study 7, STAT.0163.001.0001, at paras 20–31.
- 9 Find & Connect Web Resource Project, *Institution for Girls, Hay (1961–1974)*, <http://www.findandconnect.gov.au/guide/nsw/NE01033> (viewed 19 September 2014); Exhibit 7-0008, Case Study 7, EXH.007.008.0001.
- 10 B Boyle, 'The child welfare schools: recollections of these unique schools and the men and women who taught in them often under considerable difficulty', unpublished typescript, 1996, pp 73–74; Find & Connect Web Resource Project, *Institution for Girls, Hay (1961–1974)*, <http://www.findandconnect.gov.au/guide/nsw/NE01033> (viewed 19 September 2014); see also Exhibit 7-0022, Case Study 7, STAT.0167.001.0001 at para. 22.
- 11 Exhibit 7-0022, Case Study 7, STAT.0167.001.0001 at paras 23–24; *Child Welfare Act 1939* (NSW), s. 53(b).
- 12 Exhibit 7-0022, Case Study 7, STAT.0167.001.0001 at para. 25.
- 13 Find & Connect Web Resource Project, *Institution for Girls, Hay (1961–1974)*, <http://www.findandconnect.gov.au/guide/nsw/NE01033> (viewed 19 September 2014); Exhibit 7-0022, Case Study 7, STAT.0167.001.0001 at para. 236.
- 14 Exhibit 7-0022, Case Study 7, STAT.0167.001.0001 at para. 24.
- 15 Exhibit 7-0019, Case Study 7, STAT.0152.001.0001_R at para. 29; Transcript of Y Kitchener, Case Study 7 at 5121:25–30.
- 16 Exhibit 7-0018, Case Study 7, STAT.0157.001.0001_R at para. 29.
- 17 Transcript of W Robb, Case Study 7 at 5083:37–5084:9.
- 18 Transcript of W Robb, Case Study 7 at 5083:27–35.
- 19 Exhibit 7-0011, Case Study 7, STAT.0149.001.0001_R at para. 18.
- 20 Transcript of D Chard, Case Study 7, 4971:31–38; see also Exhibit 7-0016, Case Study 7, STAT.0147.001.0001_R at paras 30–31.
- 21 Exhibit 7-0009, Case Study 7, STAT.0158.001.0001_R at para. 45.
- 22 Exhibit 7-0012, Case Study 7, STAT.0155.001.0001 at para. 13.
- 23 Exhibit 7-0008, Case Study 7, EXH.007.008.002.
- 24 Find & Connect Web Resource Project, *Parramatta Girls Training School (1946–1974)*, 2013, <http://www.findandconnect.gov.au/ref/nsw/biogs/NE01318b.htm> (viewed 19 September 2014).
- 25 Find & Connect Web Resource Project, *Parramatta Girls Training School (1946–1974)*, 2013, <http://www.findandconnect.gov.au/ref/nsw/biogs/NE01318b.htm> (viewed 19 September 2014); Find & Connect Web Resource Project, *Taldree (1974–1980)*, 2011, <http://www.findandconnect.gov.au/>

- [ref/nsw/biogs/NE00435b.htm](#) (viewed 19 September 2014); Find & Connect Web Resource Project, *Kamballa (1974–1983)*, <http://www.findandconnect.gov.au/guide/nsw/NE00416> (viewed 19 September 2014).
- 26 Parramatta Female Factory Precinct Association, *Parramatta Girls Home*, <http://www.parragirls.org.au/parramatta-girls-home.php> (viewed 19 September 2014); Parliament of New South Wales, *Parramatta Female Factory Precinct*, motion by Ms Lee Rhiannon, p. 6746, a–e, <http://www.parliament.nsw.gov.au/prod/PARLMENT/hansArt.nsf/V3Key/LC20080410003> (viewed 19 September 2014).
- 27 Exhibit 7-0022, Case Study 7, STAT.0167.001.0001 at para. 27.
- 28 Hay Shire Council, *Hay Gaol Museum – Our town’s story*, <http://www.hay.nsw.gov.au/Museums/GaolMuseum/tabid/98/Default.aspx> (viewed 19 September 2014).
- 29 W Robb, ‘Hay Institution for Girls’, *Inside: Life in Children’s Homes*, National Museum of Australia, 2010, <http://nma.gov.au/blogs/inside/2010/05/20/hay-institution-for-girls/> (viewed 19 September 2014).
- 30 *Child Welfare Act 1939* (NSW), Part XIV, ss 72–73.
- 31 *Child Welfare Act 1939* (NSW); Find & Connect Web Resource Project, *Child Welfare Act 1939, State of New South Wales (1939–1987)*, <http://www.findandconnect.gov.au/guide/nsw/NE00014> (viewed 19 September 2014); Exhibit 7-0022, Case Study 7, STAT.0167.001.0001 at para. 34; Transcript of K Alexander, Case Study 7, 5176:31–46.
- 32 *Child Welfare Act 1939* (NSW), s. 82.
- 33 *Child Welfare Act 1939* (NSW), s. 52.
- 34 Exhibit 7-0006, Case Study 7, STAT.0162.001.0001_R at paras 18–20.
- 35 *Child Welfare Act 1939* (NSW), s. 56(3) for isolated detention powers.
- 36 Human Rights and Equal Opportunity Commission, *Bringing them home: National inquiry into the separation of Aboriginal and Torres Strait Islander children from their families*, Sydney, 1997, Part 2, Chapter 2(3) – New South Wales and the ACT – The welfare.
- 37 Transcript of M Farrell-Hooker, Case Study 7 at 5013:43–5014:32; Transcript of W Robb, Case Study 7 at 5080:18–27.
- 38 Senate Community Affairs References Committee, *Forgotten Australians: A report on Australians who experienced institutional or out-of-home care as children*, Canberra, 2004, pp 55–56.
- 39 Senate Community Affairs References Committee, *Lost Innocents and Forgotten Australians revisited: Report on the progress with the implementation of the recommendations of the Lost Innocents and Forgotten Australians reports*, Canberra, 2009, p. 207.
- 40 Transcript of J Mulquiney, Case Study 7 at 4980:6–10; Exhibit 7-0003, Case Study 7, STAT.0150.001.0001 at para. 9.
- 41 Exhibit 7-0010, Case Study 7, STAT.0156.001.0001 at para 10; Exhibit 7-0012, Case Study 7, STAT.0155.001.0001 at paras 6 and 8.
- 42 Exhibit 7-0006, Case Study 7, STAT.0162.001.0001_R at paras 27–30.
- 43 Transcript of J Mulquiney, Case Study 7 at 4982:31–47.
- 44 Transcript of J Mulquiney, Case Study 7 at 4989:11–17.
- 45 Exhibit 7-0012, Case Study 7, STAT.0155.001.0001 at para. 6.
- 46 Exhibit 7-0018, Case Study 7, STAT.0157.001.0001_R at para. 30.
- 47 Exhibit 7-0011, Case Study 7, STAT.0179.001.0001_R at paras 21–24; Transcript of D Chard, Case Study 7 at 4966:14–24; Exhibit 7-0018, Case Study 7, STAT.0157.001.0001_R at para. 23; Exhibit 7-0016, Case Study 7, STAT.0147.001.0001_R at para. 31.
- 48 Exhibit 7-0016, Case Study 7, STAT.0147.001.0001_R at para. 31.
- 49 Exhibit 7-0011, Case Study 7, STAT.0179.001.0001_R at paras 21–24.
- 50 Exhibit 7-0019, Case Study 7, STAT.0152.001.0001_R at para. 24.
- 51 Exhibit 7-0016, Case Study 7, STAT.0147.001.0001_R at para. 31.
- 52 Transcript of W Robb, Case Study 7 at 5089:33–38.
- 53 Exhibit 7-0016, Case Study 7, STAT.0147.001.0001_R at para. 31; Exhibit 7-0018, Case Study 7, STAT.0157.001.0001_R at paras 32–34.
- 54 Exhibit 7-0011, Case Study 7, STAT.0179.001.0001_R at para. 28; Transcript of D Chard, Case Study 7 at 4965:33–39; Transcript of D Chard, Case Study 7 at 4967:25–29.

- 55 Exhibit 7-0018, Case Study 7, STAT.0157.001.0001_R at paras 32–34; Exhibit 7-0011, Case Study 7, STAT.0179.001.0001_R at para. 20.
- 56 Transcript of J Mulquiney, Case Study 7 at 4989:11–20.
- 57 Exhibit 7-0018, Case Study 7, STAT.0157.001.0001_R at paras 32–34; Exhibit 7-0011, Case Study 7, STAT.0179.001.0001_R at para. 20.
- 58 Exhibit 7-0012, Case Study 7, STAT.0155.001.0001 at para. 21; Exhibit 7-0013, Case Study 7, STAT.0151.001.0001_R at para. 31; Exhibit 7-0006, Case Study 7, STAT.0162.001.0001_R at paras 27–30; Transcript of R Stone, Case Study 7 at 5057:37–45; Transcript of Y Kitchener, Case Study 7 at 5120:42–5121:9.
- 59 Exhibit 7-0013, Case Study 7, STAT.0151.001.0001_R at para. 39; Exhibit 7-0011, Case Study 7, STAT.0149.001.0001_R at para. 24; Exhibit 7-0018, Case Study 7, STAT.0157.001.0001_R at para. 43.
- 60 Exhibit 7-0011, Case Study 7, STAT.0179.001.0001_R at para. 10.
- 61 Exhibit 7-0006, Case Study 7, STAT.0162.001.0001_R at para. 52.
- 62 Exhibit 7-0006, Case Study 7, STAT.0162.001.0001_R at paras 27–30.
- 63 Exhibit 7-0011, Case Study 7, STAT.0179.001.0001_R at para. 13.
- 64 Exhibit 7-0007, Case Study 7, STAT.0163.001.0001 at para. 12.
- 65 Exhibit 7-0007, Case Study 7, STAT.0163.001.0001 at paras 18–19.
- 66 Exhibit 7-0021, Case Study 7, STAT.0153.001.0001_R at para. 33.
- 67 Transcript of L Powell, Case Study 7 at 4955:20–23.
- 68 Exhibit 7-0013, Case Study 7, STAT.0151.001.0001_R at para. 37.
- 69 Transcript of W Robb, Case Study 7 at 5091:39–5092:40.
- 70 Exhibit 7-0018, Case Study 7, STAT.0157.001.0001_R at para. 41; Transcript of W Robb, Case Study 7 at 5089:18–25.
- 71 Exhibit 7-0003, Case Study 7, STAT.0150.001.0001 at para. 14; Exhibit 7-0017, Case Study 7, STAT.0154.001.0001_R at paras 30–31; Transcript of J Mulquiney, Case Study 7 at 4983:10–13; Transcript of J Mulquiney, Case Study 7 at 4983:19–20; Exhibit 7-0006, Case Study 7, STAT.0162.001.0001_R at para. 42; Exhibit 7-0018, Case Study 7, STAT.0157.001.0001_R at para. 36.
- 72 Exhibit 7-0011, Case Study 7, STAT.0179.001.0001_R at para. 29.
- 73 Exhibit 7-0019, Case Study 7, STAT.0152.001.0001_R at para. 24.
- 74 Exhibit 7-0006, Case Study 7, STAT.0162.001.0001_R at para. 31; Exhibit 7-0012, Case Study 7, STAT.0155.001.0001 at para. 9; Transcript of M Farrell-Hooker, Case Study 7 at 5018:45–5019:7; Exhibit 7-0018, Case Study 7, STAT.0157.001.0001_R at para. 19.
- 75 Exhibit 7-0011, Case Study 7, STAT.0179.001.0001_R at para. 26; Exhibit 7-0019, Case Study 7, STAT.0152.001.0001_R at para. 24; Exhibit 7-0018, Case Study 7, STAT.0157.001.0001_R at para. 19.
- 76 Exhibit 7-0011, Case Study 7, STAT.0179.001.0001_R at para. 9; Exhibit 7-0009, Case Study 7, STAT.0158.001.0001_R at paras 40–41; Exhibit 7-0020, Case Study 7, STAT.0148.001.0001 at para. 13; Transcript of C Campbell, Case Study 7 at 5151:8–5152:27.
- 77 Exhibit 7-0004, Case Study 7, STAT.0160.001.0001_R at para. 34; Transcript of J Mulquiney, Case Study 7 at 4994:28–37; Exhibit 7-0011, Case Study 7, STAT.0179.001.0001_R at para. 9.
- 78 Transcript of Y Kitchener, Case Study 7 at 5120:20–32.
- 79 Exhibit 7-0018, Case Study 7, STAT.0157.001.0001_R at paras 16 and 21; Transcript of J Mulquiney, Case Study 7 at 4989:22–4990:30; Exhibit 7-0017, Case Study 7, STAT.0154.001.0001_R at paras 30–31.
- 80 Exhibit 7-0011, Case Study 7, STAT.0179.001.0001_R at para. 25; Exhibit 7-0018, Case Study 7, STAT.0157.001.0001_R at para. 37.
- 81 Exhibit 7-0018, Case Study 7, STAT.0157.001.0001_R at para. 37.
- 82 Exhibit 7-0011, Case Study 7, STAT.0149.001.0001_R at para. 11.
- 83 Exhibit 7-0007, Case Study 7, STAT.0163.001.0001 at para. 12; Transcript of L Powell, Case Study 7 at 4954:42–43; Transcript of J Mulquiney, Case Study 7 at 4992:23–29; Exhibit 7-0020, Case Study 7, STAT.0148.001.0001 at para. 27.
- 84 Exhibit 7-0013, Case Study 7, STAT.0151.001.0001_R at para. 36; Transcript of M Farrell-Hooker, Case Study 7 at 5008:33–40.

- 85 Exhibit 7-0003, Case Study 7, STAT.0150.001.0001 at para. 24.
- 86 Exhibit 7-0006, Case Study 7, STAT.0162.001.0001_R at para. 36.
- 87 Exhibit 7-0018, Case Study 7, STAT.0157.001.0001_R at para. 15.
- 88 Transcript of D Chard, Case Study 7 at 4964:40–42.
- 89 Transcript of J Mulquiney, Case Study 7 at 4995:17–24.
- 90 Exhibit 7-0019, Case Study 7, STAT.0152.001.0001_R at para. 20.
- 91 Exhibit 7-0020, Case Study 7, STAT.0148.001.0001 at para. 35.
- 92 Exhibit 7-0006, Case Study 7, STAT.0162.001.0001_R at para. 44.
- 93 Exhibit 7-0011, Case Study 7, STAT.0179.001.0001_R at para. 32.
- 94 Exhibit 7-0018, Case Study 7, STAT.0157.001.0001_R at para. 42.
- 95 Transcript of J Mulquiney, Case Study 7 at 4990:8–22.
- 96 Exhibit 7-0015, Case Study 7, EXH.007.015.0001; Transcript of M Farrell-Hooker, Case Study 7 at 5017:10–33.
- 97 Exhibit 7-0019, Case Study 7, STAT.0152.001.0001_R at para. 19; Exhibit 7-0020, Case Study 7, STAT.0148.001.0001 at para. 22.
- 98 Exhibit 7-0018, Case Study 7, STAT.0157.001.0001_R at para. 23.
- 99 Exhibit 7-0018, Case Study 7, STAT.0157.001.0001_R at para. 24.
- 100 Exhibit 7-0012, Case Study 7, STAT.0155.001.0001 at para. 14.
- 101 Exhibit 7-0006, Case Study 7, STAT.0162.001.0001_R at paras 27–30; Exhibit 7-0009, Case Study 7, STAT.0158.001.0001_R at para. 45.
- 102 Exhibit 7-0002, NSW.COMS.516.001.1327; Exhibit 7-0002, NSW.COMS.516.001.1356.
- 103 Transcript of M Farrell-Hooker, Case Study 7 at 5007:16–22.
- 104 Exhibit 7-0002, NSW.COMS.516.001.1319; Exhibit 7-0002, NSW.COMS.516.0010.1183; before Mayhew was promoted to Superintendent, he was Deputy Superintendent from 13 August 1962.
- 105 Exhibit 7-0002, NSW.COMS.519.001.0070; Exhibit 7-0002, NSW.COMS.516.001.0140_E; Exhibit 7-0002, NSW.COMS.516.001.0041.
- 106 Transcript of F Hillery, Case Study 7 at 4877:8–34; Exhibit 7-0004, Case Study 7, STAT.0160.001.0001_R at para. 30; Exhibit 7-0002, NSW.COMS.516.001.2584.
- 107 Exhibit 7-0002, NSW.COMS.516.001.2556_E_R; Exhibit 7-0002, NSW.COMS.516.001.2555_E.
- 108 Exhibit 7-0002, NSW.COMS.532.001.0062; Exhibit 7-0002, NSW.COMS.532.001.0044; although Ward was recommended for Ormond on 20 July 1962, documents show that he did not move there until 22 November.
- 109 Exhibit 7-0002, NSW.COMS.516.001.1702; Exhibit 7-0002, NSW.COMS.502.001.1098_E; Exhibit 7-0002, NSW.COMS.516.001.1624
- 110 Exhibit 7-0002, NSW.COMS.516.001.0927.
- 111 Exhibit 7-0002, NSW.COMS.521.001.0194; Exhibit 7-0002, NSW.COMS.521.001.0178; NSW.COMS.521.001.0176; Exhibit 7-0002 at NSW.COMS.521.001.0080.
- 112 Exhibit 7-0006, Case Study 7, STAT.0162.001.0001_R at paras 33–34; Exhibit 7-0005, Case Study 7, STAT.0161.001.0001 at para. 10; Exhibit 7-0003, Case Study 7, STAT.0150.001.0001 at para. 14; Exhibit 7-0017, Case Study 7, STAT.0154.001.0001_R at para. 28.
- 113 Transcript of OA, Case Study 7 at 4887:25–37.
- 114 Transcript of D Graham, Case Study 7 at 4899:36–4900:11.
- 115 Transcript of C Campbell, Case Study 7 at 5139:10–22.
- 116 Transcript of W Patton, Case Study 7 at 4922:26–4923:7.
- 117 Transcript of RN, Case Study 7 at 4942:28–36.
- 118 Transcript of RN, Case Study 7 at 4942:41–46.
- 119 Transcript of RN, Case Study 7 at 4943:1–7.
- 120 Transcript of D Chard, Case Study 7 at 4959:7–22.
- 121 Transcript of M Farrell-Hooker, Case Study 7 at 5007:16–22.

- ¹²² Exhibit 7-0012, Case Study 7, STAT.0155.001.0001 at para. 11; Transcript of J Mulquiney, Case Study 7 at 4984:28–4985:15.
- ¹²³ Exhibit 7-0012, Case Study 7, STAT.0155.001.0001 at para. 12.
- ¹²⁴ Transcript of R Kitson, Case Study 7 at 4912:46–47.
- ¹²⁵ Transcript of R Kitson, Case Study 7 at 4914:7–13.
- ¹²⁶ Transcript of W Robb, Case Study 7 at 5076:44–5077:13.
- ¹²⁷ Exhibit 7-0021, Case Study 7, STAT.0153.001.0001_R at para. 32; Transcript of D Luke, Case Study 7 at 5168:28–37.
- ¹²⁸ Transcript of D Chard, Case Study 7 at 4960:7–16.
- ¹²⁹ Transcript of M Farrell-Hooker, Case Study 7 at 5008:9–14.
- ¹³⁰ Transcript of L Powell, Case Study 7 at 4951:32–40.
- ¹³¹ Exhibit 7-0002, NSW.COMS.502.001.1047_E; Exhibit 7-0002, NSW.COMS.502.001.0149_E; Exhibit 7-0002, NSW.COMS.502.001.0166_E_R; Exhibit 7-0002, NSW.COMS.502.001.1048_E_R.
- ¹³² Transcript of F Hillery, Case Study 7 at 4877:5–6; Transcript of F Hillery, Case Study 7 at 4878:31–32.
- ¹³³ Transcript of F Hillery, Case Study 7 at 4877:8–34.
- ¹³⁴ Exhibit 7-0003, Case Study 7, STAT.0150.001.0001 at para. 10.
- ¹³⁵ Exhibit 7-0004, Case Study 7, STAT.0160.001.0001_R at para. 30.
- ¹³⁶ Exhibit 7-0002, NSW.COMS.516.001.2706_E_R; Exhibit 7-0002, NSW.COMS.516.001.2537_E_R; Exhibit 7-0002, NSW.COMS.516.001.2682_E_R.
- ¹³⁷ Transcript of C Campbell, Case Study 7 at 5139:35–5140:19.
- ¹³⁸ Exhibit 7-0021, Case Study 7, STAT.0153.001.0001_R at paras 33–34; Transcript of D Luke, Case Study 7 at 5169:8–23.
- ¹³⁹ Transcript of J McNally, Case Study 7 at 5067:7–18.
- ¹⁴⁰ Transcript of W Robb, Case Study 7 at 5077:4–13.
- ¹⁴¹ Transcript of D Chard, Case Study 7 at 4960:7–16.
- ¹⁴² Transcript of L Powell, Case Study 7 at 4951:32–40.
- ¹⁴³ Transcript of Y Kitchener, Case Study 7 at 5111:20–26.
- ¹⁴⁴ Exhibit 7-0002, NSW.COMS.516.001.0149_E; Exhibit 7-0002, NSW.COMS.502.001.1094_E; Exhibit 7-0002, NSW.COMS.502.001.1101_E_R.
- ¹⁴⁵ Exhibit 7-0002, at NSW.COMS.502.001.1095_E_R.
- ¹⁴⁶ Transcript of M Farrell-Hooker, Case Study 7 at 5007:44–5008:7; Transcript of M Farrell-Hooker, Case Study 7 at 5036:38–43.
- ¹⁴⁷ Transcript of M Farrell-Hooker, Case Study 7 at 5027:35–45.
- ¹⁴⁸ Transcript of M Farrell-Hooker, Case Study 7 at 5027:28–33.
- ¹⁴⁹ Transcript of Y Kitchener, Case Study 7 at 5126:1–5127:44.
- ¹⁵⁰ Transcript of Y Kitchener, Case Study 7 at 5128:12–46.
- ¹⁵¹ Transcript of Y Kitchener, Case Study 7 at 5128:18–33.
- ¹⁵² Transcript of Y Kitchener, Case Study 7 at 5127:46–5128:2.
- ¹⁵³ Exhibit 7-0002, NSW.COMS.516.001.0850_E_R.
- ¹⁵⁴ Exhibit 7-0002, NSW.COMS.516.001.0855; Exhibit 7-0002, NSW.COMS.516.001.0848; Exhibit 7-0002, NSW.COMS.516.001.0840.
- ¹⁵⁵ Transcript of Y Kitchener, Case Study 7 at 5111:38–5112:38.
- ¹⁵⁶ Exhibit 7-0002, NSW.COMS.516.001.0208_E_R.
- ¹⁵⁷ Exhibit 7-0002, NSW.COMS.521.001.0080.
- ¹⁵⁸ Transcript of J Mulquiney, Case Study 7 at 4995:17–24; Exhibit 7-0011, Case Study 7, STAT.0149.001.0001_R at para. 33; Exhibit 7-0012, Case Study 7, STAT.0155.001.0001 at para. 29; Exhibit 7-0013, Case Study 7, STAT.0151.001.0001_R at para. 34; Exhibit 7-0019, Case Study 7, STAT.0152.001.0001_R at para. 21; Exhibit 7-0020, Case Study 7, STAT.0148.001.0001 at para. 27; Exhibit 7-0016, Case Study 7, STAT.0147.001.0001_R at para. 34.

- 159 Transcript of F Hillery, Case Study 7 at 4881:23–27; Transcript of W Robb, Case Study 7 at 5083:10–21; Exhibit 7-0012, Case Study 7, STAT.0155.001.0001 at para. 19; Exhibit 7-0020, Case Study 7, STAT.0148.001.0001 at para. 27; Exhibit 7-0006, Case Study 7, STAT.0162.001.0001_R at para. 43.
- 160 Transcript of OA, Case Study 7 at 4888:1–37; Exhibit 7-0011, Case Study 7, STAT.0149.001.0001_R at para. 19; Exhibit 7-0018, Case Study 7, STAT.0157.001.0001_R at paras 47-48; Exhibit 7-0020, Case Study 7, STAT.0148.001.0001 at para. 27; Exhibit 7-0016, Case Study 7, STAT.0147.001.0001_R at para. 34.
- 161 Exhibit 7-0009, Case Study 7, STAT.0158.001.0001_R at para 50.
- 162 Exhibit 7-0012, Case Study 7, STAT.0155.001.0001 at paras 12–18.
- 163 Transcript of M Farrell-Hooker, Case Study 7 at 5016:11–23.
- 164 Exhibit 7-0010, Case Study 7, STAT.0156.001.0001 at para. 9.
- 165 Exhibit 7-0006, Case Study 7, STAT.0162.001.0001_R at paras 36 and 39; Exhibit 7-0019, Case Study 7, STAT.0152.001.0001_R at para. 27; Exhibit 7-0020, Case Study 7, STAT.0148.001.0001 at para. 36.
- 166 Exhibit 7-0013, Case Study 7, STAT.0151.001.0001_R at para. 39.
- 167 Exhibit 7-0006, Case Study 7, STAT.0162.001.0001_R at para. 43.
- 168 Transcript of W Robb, Case Study 7 at 5095:6–23.
- 169 Transcript of W Robb, Case Study 7 at 5095:39–45.
- 170 Exhibit 7-0016, Case Study 7, STAT.0147.001.0001_R at para. 35.
- 171 Exhibit 7-0019, Case Study 7, STAT.0152.001.0001_R at para. 26.
- 172 Exhibit 7-0005, Case Study 7, STAT.0161.001.0001 at para. 10.
- 173 Exhibit 7-0007, Case Study 7, STAT.0163.001.0001 at paras 14-16.
- 174 Exhibit 7-0013, Case Study 7, STAT.0151.001.0001_R at para. 35.
- 175 Exhibit 7-0003, Case Study 7, STAT.0150.001.0001 at para. 25.
- 176 Transcript of OA, Case Study 7 at 4886:24–44.
- 177 Transcript of OA, Case Study 7 at 4891:43–4892:26; Exhibit 7-0004, Case Study 7, STAT.0160.001.0001_R at para. 31.
- 178 Exhibit 7-0006, Case Study 7, STAT.0162.001.0001_R at para. 35.
- 179 Exhibit 7-0006, Case Study 7, STAT.0162.001.0001_R at paras 36–39.
- 180 Exhibit 7-0017, Case Study 7, STAT.0154.001.0001_R at para. 29.
- 181 Transcript of OA, Case Study 7 at 4889:8–34.
- 182 Exhibit 7-0003, Case Study 7, STAT.0150.001.0001 at para. 18.
- 183 Exhibit 7-0007, Case Study 7, STAT.0163.001.0001 at paras 29–31.
- 184 Transcript of D Chard, Case Study 7 at 4969:25–35.
- 185 Transcript of W Robb, Case Study 7 at 5076:24–25; Transcript of W Robb, Case Study 7 at 5080:13–16.
- 186 Transcript of R Kitson, Case Study 7 at 4916:28–47.
- 187 Transcript of OA, Case Study 7 at 4893:38–43.
- 188 Transcript of C Campbell, Case Study 7 at 5141:15–18.
- 189 Transcript of C Campbell, Case Study 7 at 5142:17–26.
- 190 Transcript of C Campbell, Case Study 7 at 5144:20–26.
- 191 Transcript of J Mulquiney, Case Study 7 at 4995:17–24.
- 192 Transcript of D Graham, Case Study 7 at 4905:34–45.
- 193 Transcript of W Robb, Case Study 7 at 5080:18–27.
- 194 Transcript of M Farrell-Hooker, Case Study 7 at 5015:37–38; Exhibit 7-0013, Case Study 7, STAT.0151.001.0001_R at paras 64–69.
- 195 Transcript of R Kitson, Case Study 7 at 4914:46–4915:3; Transcript of R Kitson, Case Study 7 at 4916:2–4; Transcript of L Powell, Case Study 7 at 4952:28–42; Transcript of J Mulquiney, Case Study 7 at 4990:41–4991:8; Transcript of C Campbell, Case Study 7 at 5140:47–5141:6; Transcript of Y Kitchener, Case Study 7 at 5113:21–26.
- 196 Transcript of M Farrell-Hooker, Case Study 7 at 5005:19–26; Transcript of R Stone, Case Study 7 at 5047:28–33; Exhibit 7-0017, Case Study 7, STAT.0154.001.0001_R at paras 32–33 and 37.

- ¹⁹⁷ Exhibit 7-0021, Case Study 7, STAT.0153.001.0001_R at para. 40; Transcript of Y Kitchener, Case Study 7 at 5123:28–42.
- ¹⁹⁸ Transcript of OA, Case Study 7 at 4891:30–33
- ¹⁹⁹ Transcript of OA, Case Study 7 at 4891:36–37; Exhibit 7-0004, Case Study 7, STAT.0160.001.0001_R at para. 50.
- ²⁰⁰ Exhibit 7-0004, Case Study 7, STAT.0160.001.0001_R at para. 44; Transcript of OA, Case Study 7 at 4893:14.
- ²⁰¹ Transcript of D Chard, Case Study 7 at 4964:40–46.
- ²⁰² Transcript of D Chard, Case Study 7 at 4958:21–26.
- ²⁰³ Transcript of R Stone, Case Study 7 at 5048:24–33.
- ²⁰⁴ Transcript of R Stone, Case Study 7 at 5049:10–14.
- ²⁰⁵ Transcript of R Stone, Case Study 7 at 5050:31–32.
- ²⁰⁶ Exhibit 7-0004, Case Study 7, STAT.0160.001.0001_R at para. 53; Transcript of J Mulquiney, Case Study 7 at 4997:38–40; Transcript of D Chard, Case Study 7 at 4970:7–8; Exhibit 7-0013, Case Study 7, STAT.0151.001.0001_R at para. 50; Transcript of M Farrell-Hooker, Case Study 7 at 5011:24–31; Transcript of Y Kitchener, Case Study 7 at 5122:13–17; Transcript of C Campbell, Case Study 7 at 5145:25–26; Transcript of L Powell, Case Study 7 at 4954:26–27; Exhibit 7-0011, Case Study 7, STAT.0149.001.0001_R at para. 30; Exhibit 7-0018, Case Study 7, STAT.0157.001.0001_R at para. 38; Exhibit 7-0007, Case Study 7, STAT.0163.001.0001 at para. 11.
- ²⁰⁷ Transcript of D Chard, Case Study 7 at 4965:5, 13–15; Transcript of Y Kitchener, Case Study 7 at 5122:13–17.
- ²⁰⁸ Exhibit 7-0016, Case Study 7, STAT.0147.001.0001_R at para. 51.
- ²⁰⁹ Transcript of Y Kitchener, Case Study 7 at 5122:13–17.
- ²¹⁰ Exhibit 7-0004, Case Study 7, STAT.0160.001.0001_R at para. 29; Transcript of OA, Case Study 7 at 4885:27–33; Transcript of OA, Case Study 7 at 4891:28–41.
- ²¹¹ Transcript of D Graham, Case Study 7 at 4903:21–24; Transcript of R Kitson, Case Study 7 at 4917:38–44.
- ²¹² Transcript of J Mulquiney, Case Study 7 at 4996:45–4997:21; Transcript of F Hillery, Case Study 7 at 4876:7; Transcript of F Hillery, Case Study 7 at 4879:11–19.
- ²¹³ Transcript of L Powell, Case Study 7 at 4953:40–4954:22; Transcript of D Chard, Case Study 7 at 4964:8–10.
- ²¹⁴ Transcript of W Patton, Case Study 7 at 4928:31–39.
- ²¹⁵ Transcript of RN, Case Study 7 at 4948:30–43.
- ²¹⁶ Transcript of L Powell, Case Study 7 at 4953:40–4954:22.
- ²¹⁷ Exhibit 7-0004, Case Study 7, STAT.0160.001.0001_R at para. 3; Transcript of R Kitson, Case Study 7 at 4909:5; Transcript of L Powell, Case Study 7 at 4950:32; Transcript of R Stone, Case Study 7 at 5049:5–6; Transcript of J Mulquiney, Case Study 7 at 4978:21; Exhibit 7-0017, Case Study 7, STAT.0154.001.0001_R at para. 3; Exhibit 7-0020, Case Study 7, STAT.0148.001.0001 at para. 3; Exhibit 7-0019, Case Study 7, STAT.0152.001.0001_R at para. 3; Exhibit 7-0006, Case Study 7, STAT.0162.001.0001_R at para. 4.
- ²¹⁸ Transcript of D Graham, Case Study 7 at 4906:7–15; Transcript of J Mulquiney, Case Study 7 at 4997:46–4998:15.
- ²¹⁹ Transcript of F Hillery, Case Study 7 at 4879:23–4880:18.
- ²²⁰ Transcript of OA, Case Study 7 at 4893:17–4894:21.
- ²²¹ Transcript of D Graham, Case Study 7 at 4902:31–4903:36; Transcript of D Graham, Case Study 7 at 4906:21–26; Transcript of D Graham, Case Study 7 at 4907:9–12.
- ²²² Transcript of R Kitson, Case Study 7 at 4917:46–4918:23.
- ²²³ Transcript of W Patton, Case Study 7 at 4927:41–4930:42.
- ²²⁴ Transcript of RN, Case Study 7 at 4937:24–34; Transcript of RN, Case Study 7 at 4945:24–36; Transcript of RN, Case Study 7 at 4949:6–9.
- ²²⁵ Transcript of L Powell, Case Study 7 at 4953:22–23.
- ²²⁶ Transcript of D Chard, Case Study 7 at 4963:31–4964:2; Transcript of D Chard, Case Study 7 at 4973:14–8.

- 227 Transcript of J Mulquiney, Case Study 7 at 4991:10–27; Transcript of J Mulquiney, Case Study 7 at 4992:41–43; Transcript of J Mulquiney, Case Study 7 at 4993:12–23; Transcript of J Mulquiney, Case Study 7 at 4995:30–4996:6.
- 228 Transcript of M Farrell-Hooker, Case Study 7 at 5011:42–45; Transcript of M Farrell-Hooker, Case Study 7 at 5020:27.
- 229 Transcript of R Stone, Case Study 7 at 5050:5; Transcript of R Stone, Case Study 7 at 5053:5–10; Transcript of R Stone, Case Study 7 at 5056:13–29.
- 230 Exhibit 7-0017, Case Study 7, STAT.0154.001.0001_R at paras 38–39 and 42–44.
- 231 Transcript of W Robb, Case Study 7 at 5080:46–5081:38.
- 232 Transcript of Y Kitchener, Case Study 7 at 5108:34; Transcript of Y Kitchener, Case Study 7 at 5122:19–22; Transcript of Y Kitchener, Case Study 7 at 5113:43–45.
- 233 Transcript of C Campbell, Case Study 7 at 5142:1–5; Transcript of C Campbell, Case Study 7 at 5138:28–34.
- 234 Exhibit 7-0021, Case Study 7, STAT.0153.001.0001_R at paras 47–49.
- 235 Transcript of D Chard, Case Study 7 at 4965:33–34.
- 236 Transcript of D Chard, Case Study 7 at 4970:45–4971:5.
- 237 Transcript of D Chard, Case Study 7 at 4972:6–9.
- 238 Transcript of M Farrell-Hooker, Case Study 7 at 5012:3–20.
- 239 Transcript of R Stone, Case Study 7 at 5049:1–3.
- 240 Transcript of R Stone, Case Study 7 at 5056:1–11.
- 241 Transcript of D Chard, Case Study 7 at 4964:12–16; Transcript of Y Kitchener, Case Study 7 at 5115:28–5116:4; Transcript of Y Kitchener, Case Study 7 at 5123:7–22; Transcript of R Kitson, Case Study 7 at 4918:4–5; Transcript of J Mulquiney, Case Study 7 at 4992:14–21.
- 242 Transcript of D Graham, Case Study 7 at 4901:19–38; Transcript of W Patton, Case Study 7 at 4928:22–28.
- 243 Transcript of M Farrell-Hooker, Case Study 7 at 5019:44–5020:1.
- 244 Transcript of R Kitson, Case Study 7 at 4918:12–17.
- 245 Transcript of L Powell, Case Study 7 at 4953:1–4956:8.
- 246 Transcript of W Robb, Case Study 7 at 5081:31–34.
- 247 Transcript of W Robb, Case Study 7 at 5081:9–12.
- 248 Transcript of Y Kitchener, Case Study 7 at 5114:25–35; Transcript of Y Kitchener, Case Study 7 at 5116:6–10, 22–25.
- 249 Transcript of D Graham, Case Study 7 at 4906:2–7; see also Transcript of RN, Case Study 7 at 4945:16–22; Transcript of D Chard, Case Study 7 at 4965:6–10; Transcript of J Mulquiney, Case Study 7 at 4995:30–32; Transcript of R Stone, Case Study 7 at 5047:40–5048:22.
- 250 Robin Kitson, Mary Farrell-Hooker, Robyne Stone, Yvonne Kitchener, Coral Campbell and Denise Luke.
- 251 Transcript of M Farrell-Hooker, Case Study 7 at 5020:3–19.
- 252 Transcript of M Farrell-Hooker, Case Study 7 at 5013:8–15.
- 253 Transcript of W Patton, Case Study 7 at 4930:10–14.
- 254 Transcript of W Robb, Case Study 7 at 5082:35–37.
- 255 Exhibit 7-0017, Case Study 7, STAT.0154.001.0001_R at paras 48–51.
- 256 Transcript of Y Kitchener, Case Study 7 at 5115:39–46.
- 257 Transcript of W Patton, Case Study 7 at 4929:15–4930:3.
- 258 Transcript of R Kitson, Case Study 7 at 4917:2–9.
- 259 Transcript of D Chard, Case Study 7 at 4963:20–27.
- 260 Transcript of W Robb, Case Study 7 at 5101:47–5104:47.
- 261 Transcript of R Stone, Case Study 7 at 5050:35–45.
- 262 Transcript of R Stone, Case Study 7 at 5051:9–13.
- 263 Transcript of R Stone, Case Study 7 at 5054:44–5055:2.
- 264 Transcript of W Patton, Case Study 7 at 4930:3–8.
- 265 Transcript of W Robb, Case Study 7 at 5105:45–5106:17.
- 266 Transcript of W Robb, Case Study 7 at 5106:22–36.

- ²⁶⁷ Transcript of C Campbell, Case Study 7 at 5144:34–43.
- ²⁶⁸ Exhibit 7-0021, Case Study 7, STAT.0153.001.0001_R at para. 50.
- ²⁶⁹ Transcript of J Mulquiney, Case Study 7 at 5000:38–47; see also Transcript of R Kitson, Case Study 7 at 4918:25–27; Transcript of D Chard, Case Study 7 at 4975:4–6.
- ²⁷⁰ Transcript of D Graham, Case Study 7 at 4907:1–5.
- ²⁷¹ Transcript of D Graham, Case Study 7 at 4905:17–28; Transcript of D Graham, Case Study 7 at 4906:11–15; Transcript of D Graham, Case Study 7 at 4907:15; Transcript of R Kitson, Case Study 7 at 4917:11–20; Transcript of W Patton, Case Study 7 at 4928:9–14; Transcript of W Patton, Case Study 7 at 4929:8–38; Transcript of L Powell, Case Study 7 at 4952:42–46; Transcript of D Chard, Case Study 7 at 4968:21–24; Transcript of J Mulquiney, Case Study 7 at 4993:41–4994:46; Transcript of M Farrell-Hooker, Case Study 7 at 5012:22–26; Transcript of R Stone, Case Study 7 at 5042:43; Transcript of R Stone, Case Study 7 at 5050:20–32; Transcript of W Robb, Case Study 7 at 5084:33–5085:26; Transcript of Y Kitchener, Case Study 7 at 5119:3.
- ²⁷² Transcript of C Campbell, Case Study 7 at 5146:45–5147:12; see also Transcript of Y Kitchener, Case Study 7 at 5131:14–5132:2.
- ²⁷³ Transcript of D Chard, Case Study 7 at 4962:47–4963:3.
- ²⁷⁴ Transcript of J Mulquiney, Case Study 7 at 4995:1–10.
- ²⁷⁵ Transcript of R Kitson, Case Study 7 at 4917:27–36.
- ²⁷⁶ Transcript of W Robb, Case Study 7 at 5082:22–30.
- ²⁷⁷ Transcript of W Robb, Case Study 7 at 5105:9–13.
- ²⁷⁸ Transcript of W Robb, Case Study 7 at 5105:15–25.
- ²⁷⁹ Transcript of J Gleeson, Case Study 7 at 4874:9–12.
- ²⁸⁰ Transcript of V Ruis, Case Study 7 at 5258:26–5259:4.
- ²⁸¹ Transcript of K Alexander, Case Study 7 at 5214:28–32.
- ²⁸² Transcript of K Alexander, Case Study 7 at 5215:34–43.
- ²⁸³ Transcript of K Alexander, Case Study 7 at 5223:8–28.



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