



**STATEMENT OF WITNESS**

Statement of: REDACTED Age: **over 18 years**

This statement, consisting of 5 page(s) signed by me is true to the best of my knowledge and belief. I know that this statement is to be used for the purpose of a prosecution and that if it contains material which I know to be false or misleading, I will be guilty of an offence.

Dated the ..... of ....., .....

Signed: .....

Witnessed by (name): .....

of (address): .....

.....

Signature of Witness: .....

I provide this statement to Detective Senior Constable Wally Conte of the Child Exploitation Investigation Section at about 9.05 a.m. on Thursday 16<sup>th</sup> May 2002, at the Wakefield Street Police Complex in the presence of Yvonne Webb, Legal Adviser for the Catholic Education Office.

In RED ACT I commenced working at St Ann's Special School, 37 Finnis Street, Marion as a REDACTED teacher on a half-time basis. I was also working at REDACTED REDACTED on a half-time basis. REDACTED  
REDACTED  
REDACTED

Signed: ..... Signature witnessed by: .....

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REDACTED

In REDACTED I continued as REDACTED coordinator at St Ann's Special School on a full-time basis. I also coordinated school camps and sporting activities involving other specialist schools including St Patrick's. I was also appointed Deputy Principal. The principal at the time was Sister REDACTED I continued working in this capacity until the end of 1990.

The swimming program at St Ann's Special School commenced in 1976 and continued over the years to the present time. The swimming pool we used for this purpose was located in Balyana which is a supported accommodation unit for people with disabilities. It is located in Pasadena. When this was not available we transferred to Minda Pool at Hove. The Education Department provided the instructors we used. Each pool was assigned staff. I would also be supported by a teacher's aid from St Ann's Special School, REDACTED. In addition to this programme we conducted a block of swimming at the Marion Swimming Centre. This would be conducted by myself with the assistance of REDACTED. The class teacher for the relevant groups and other support workers would also attend to assist with supervision and dressing. The support workers were mainly paid teacher's aids but there were some volunteers involved, often students from teachers' colleges.

Signed: ..... Signature witnessed by: .....

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I am not familiar with the name Robert Hawkes. Detective Conte showed me a photograph of this person at about 9.30 a.m. on Thursday 16<sup>th</sup> May 2002. To my knowledge I have never seen this person before and I can confirm that he was never involved in any special school swimming programmes that I was organising.

I know that the principal, Sister REDACTED, had a very strong working relationship with Sergeant John Wallace of the Darlington Police Station. He was involved in the Blue Light Disco programme which we conducted for the disabled children. I know that she would phone him to obtain any background information on any volunteers or employees that may offer assistance. I know that John Wallace would conduct criminal record checks when requested and he would provide the information over the telephone. There was also a formal application policy in place for all volunteers which included interviews, references and other personal details such as current and past employment.

At the end of 1984 Sister REDACTED left to set up a Community Vocation Support Programme for the older students and her role as Principal was replaced in 1985 by Claude Hamam who was previously a class teacher at St Ann's. I continued my role as Deputy Principal to Claude Hamam until the time I left in 1990. I was replaced by Martin Aartsen who is still there. I do not know whether Claude Hamam continued the relationship with John Wallace. In 1985 I took long service leave in terms 2 and 3 and travelled on an extended holiday. I returned to the school at the beginning of term 4 in 1985 and continued in my capacity until I left at the end of the year in 1990.

Signed: ..... Signature witnessed by: .....

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I remember Brian Perkins. He was employed as a bus driver and drove the longest route, to the south. I do not know which year he became employed as bus driver for the school. I was not involved in the hiring or firing process of Brian Perkins. This route was basically from St Ann's towards the airport. On occasions I drove that route myself when the bus driver went sick as they would ring me. I immediately recall the following students were involved in that

run: MD ML MU REDACTED MS LH

LH MX and REDACTED (the three lived together). There were 24 seats on that bus and

they were always taken. There was also another bus run that went to the hills. Brian Perkins would occasionally go on that run as well. Neither bus run took us anywhere near

REDACTED

REDACTED

I know that Perkins was definitely performing his duties as bus driver when I returned from my extended holiday. He was definitely not employed as bus driver when

Sister REDACTED was there as Principal because the bus driver at that time was

REDACTED

Perkins was therefore employed when Claude Hamam was Principal.

Through my dealings with NE I became aware that LH and MX would often stay with Brian Perkins on weekends. REDACTED who was more aggressive in nature, was not included in this activity.

I am aware that Perkins borrowed the school camera equipment. I asked him on one occasion why he had the camera and he told me that it was for the purpose of taking shots of his grandchildren. He would borrow the camera on numerous occasions, particularly on weekends when we were not using it. He showed me photographs of his grandchildren accordingly.

Signed: ..... Signature witnessed by: .....

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I am also aware that another teacher at St Ann's, REDACTED was involved in placing entries in the Pedal Prix which was then held at Warradale Road Safety Centre. Perkins assisted REDACTED in building a bike which was then used by the students in the Pedal Prix together with other parents.

I know that Brian Perkins helped out in the woodwork shed as a teacher's aid. There was always a staff member present.

Signed: .....

Signature witnessed by: .....