

ANNEXURE A

- 1) When, and in what circumstances, the Department of Family and Community Services ('Department') became aware of potential claims against the State arising from child sexual abuse that took place at Bethcar.
- 2) Whether, following the criminal trials and sentencing of Colin Gibson in 2006/07 for child sexual abuse offences committed at Bethcar, or at any other time, the Department conducted any internal investigations or inquiries in relation to Bethcar and/or its potential liability in relation to child sexual abuse at Bethcar, and if so, the nature of the investigations or inquiries and their outcomes.
- 3) The officers responsible for providing instructions on behalf of the State of New South Wales in relation to the conduct of the Bethcar civil proceedings.
- 4) The conduct of the Bethcar civil proceedings, with specific reference to:
 - a) the policies, procedures or practices, if any, informing the State's approach to the civil claims brought by victims of child sexual abuse suffered at Bethcar;
 - b) the State's response to the pleadings filed by the plaintiffs;
 - c) the considerations informing the State's decision to plead a statute of limitation defence pursuant to sections 14(1)(b) and 18A of the *Limitation Act 1969 (NSW)*;
 - d) the considerations informing the State's views about prejudice to it as a result of the historical nature of the allegations;
 - e) the considerations informing the State's decisions in relation to offers of settlement, mediation or other alternative dispute resolution, including the rationale behind its decision to mediate and ultimately settle all of the claims on the basis of the District Court orders made by consent and dated 18 December 2013;
 - f) the application, if any, of the Model Litigant Policy.