

ANNEXURE A

1. The conduct of the Bethcar civil litigation, with specific reference to:
 - a. the policies, procedures or practices, if any, informing the CSO / State's approach to the civil claims brought by victims of child sexual abuse suffered at Bethcar;
 - b. the CSO / State's response to the pleadings filed by the plaintiffs;
 - c. the considerations informing the CSO / 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 CSO / State's views about prejudice to it as a result of the historical nature of the allegations;
 - e. the considerations informing the CSO / 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.