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Royal Commission
into Institutional Responses
to Child Sexual Abuse

23 December 2014

Knox Grammar School
7 Woodville Ave
Wahroonga, NSW, 2076

c/- Wendy Blacker
Partner
Gadens

By email: wendy.blacker@gadens.com

Dear Ms Blacker

Royal Commission into Institutional Responses to Child Sexual Abuse (Royal Commission)
Request for statements

The Royal Commission has been established by Letters Patent issued by the Commonwealth Governor-General and State Governors. The Terms of Reference contained in the Letters Patent can be found on the Commission's website at www.childabuseroyalcommission.gov.au/about-us/terms-of-reference.

Request for witness statements

As you are aware, the Royal Commission intends to hold a public hearing in Sydney commencing on 23 February 2014 in relation to the response of the Knox Grammar School (Knox) to allegations of child sexual abuse perpetrated by certain teachers against a large number of students. The public hearing is expected to inquire into, amongst other issues:

1. The response of Knox and the Uniting Church in Australia to concerns raised about inappropriate conduct by several teachers towards students from 1971 to 2009, and subsequent criminal proceedings.
2. Knox's response to and management of the victims' and their families' claims for redress, both at the time of the abuse and subsequent to the criminal convictions of the offenders.
3. The systems, policies and procedures in place at Knox in relation to raising and responding to concerns about child sexual abuse.
4. The regulatory system that governs Knox's response to allegations of child sexual abuse and the protection of child in its care.

As discussed, we have identified the following persons currently employed at Knox, or associated with Knox, or previously employed at Knox, as possible witnesses who are likely to be required by the Royal Commission to appear and give evidence at the public hearing:

1. John Weeks
2. Peter Roach
3. Peter Crawley
4. Dr Ian Paterson
5. Stuart Pearson

It will greatly assist the process of the public hearing if they would furnish a statement to the Royal Commission setting out the evidence that they will give. If you do not represent any of the above persons, please advise us as soon as possible.

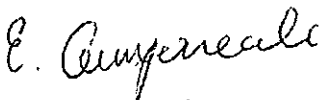
Knox is invited to furnish statements from any other witnesses whom it considers will assist the Royal Commission in the public hearing.

We anticipate that statements from the above persons will set out a chronological narrative of their knowledge of or role in relation to Knox's response to allegations of child sexual abuse by a number of staff members including convicted offenders and other unconvicted alleged perpetrators. The statements should address, where possible, the specific matters listed in Annexure A to this letter. Where appropriate, any statements furnished should refer to relevant documents. Please note that the questions in the annexure are not intended to limit the matters to be addressed in the statements – any other relevant matters should be included.

The Royal Commission requests that the statements be prepared by not later than 23 January 2015 at which time the Royal Commission intends to require their production under summons. The Royal Commission may also summons the persons who make the statements to appear and give evidence at the public hearing.

Please do not hesitate to contact Rachel Deane on 02 8284 2542 or rachel.deane@childabuseroyalcommission.gov.au if you would like to discuss any aspect of this letter.

Yours sincerely,



Enzo Camporeale

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