

Statement of Dr Ian Wilson Paterson

I am Dr Ian Wilson Paterson, of **REDACTED** in the State of New South Wales.

1. I have been provided with a copy of a statement of Ms Lucy Perry, formerly Ms Lucy Schaffler, dated 19 February 2015.
2. I have also been provided with a copy of the program for the 1989 Knox Musical, which was Guys & Dolls. A copy of that program is annexed to this statement.
3. In that program, I am named as 'producer' of the musical, which I know is correct. At Knox I produced the annual Musical each year from 1973 until my retirement in 1998.
4. Lucy Schaffler is named in the program as being in the chorus.
5. I have no specific memory of Ms Schaffler (now Ms Perry).
6. I do not have specific memories of this musical or any of the rehearsals leading up to it. Guys & Dolls was a popular musical and it was repeated at least once over the years I was producing the musicals.
7. Looking at the program I can see my son was a cast member, but this does not jog my memory.
8. In the program, thanks are given to Abbotsleigh, PLC and Roseville Girls' schools for allowing their students to participate in the production.
9. The musicals were popular and this meant that the auditions were competitive, with more students auditioning than there were roles to be cast. I aimed to include as many students interested in being involved as possible, with regard to the resources of the school and the requirements of the particular musical.

ALLEGATIONS

10. I have read the allegations contained in paragraphs 8-11 of Ms Perry's statement and I strongly deny them. I am certain the allegations are untrue.
11. I first became aware of the allegations for the first time on Friday 20 February 2015, upon being shown a copy of Ms Perry's statement.
12. I can recall the particular scene in the script of the musical Guys and Dolls but have no specific memory of any rehearsals involving that scene.
13. As far as I am aware, the allegations have not previously been reported to Knox, or to me, either by the police or Ms Perry. I believe I would have been informed of the allegations against me if they had been reported to Knox.
14. I am not aware of any other allegations or complaints of this nature made against me.
15. I cannot recall ever behaving in the manner described on stage, in full view of cast members including students from neighbouring schools and other staff members.
16. Noting there would have been students from other schools present, had there been complaints of such an incident occurring, I would have expected to be contacted from the Headmistresses of the schools with students participating, or by parents who were made aware of the allegations, to discuss their concerns.

TOUCHING

17. It was not in my nature to touch students. I certainly do not consider myself to have a reputation for being affectionate with students, let alone overly affectionate.
18. I cannot recall ever behaving in such a manner on stage, in full view of cast members including students from neighbouring schools and other staff members and parents.
19. When producing the musicals over the years, sometimes it was necessary to touch students, for example to direct them or position them in a place on stage, but this would usually be at "arms-length", above the shoulders.
20. I strongly deny ever touching any cast member of any musical I have been involved in as producer in an inappropriate or sexual manner.

FULL DRESS REHEARSALS

21. In respect of the allegations, I note the rehearsal is alleged to have been a full dress rehearsal. At the full dress rehearsals, there would ordinarily be at least two other members of staff present: Mr Brian Buggy, musical director, and Ms **REDACTED** choreographer. The orchestra, as well as the cast, would ordinarily be at the full dress rehearsals.
22. Many parents of students in the musical would also be present at the full dress rehearsals. Parents volunteered to assist with tasks such as make-up and costuming.
23. I would never deliberately behave in the manner described in Ms Perry's witness statement, which, any criminality aside, I would describe as unprofessional, disgusting and lewd. I would never deliberately behave this way regardless of whether or not anybody else was present.
24. Despite the fact that this would not affect my behaviour, I would be very conscious of the number of people, both children and adults, present at the rehearsal, including one of my own children, and as always, and was in my nature, would be mindful of keeping a respectful and professional distance from students.

ATTITUDES OF STAFF AND STUDENTS

25. A full dress rehearsal would be one of the final rehearsals, possibly the final rehearsal, leading up to the opening performances. It is usually an exciting time for the cast members, seeing months of rehearsals come to fruition.
26. Because it was generally considered a privilege to be part of the Knox musical, the performances were of a high standard, with the student cast members students would usually put in a good effort at the full dress rehearsals.
27. Although I don't have specific memories of the full dress rehearsals for the 1989 musical, I would have been surprised at the time had the students not tried to perform to the best of their ability in full costume, something they had been working towards for months.
28. The musicals provided a co-educational activity enjoyable for both male and female cast members. They aimed to celebrate the talent and hard work of both male and female cast members, not entrench a culture of misogyny.
29. If participation in the musicals meant exposing the female cast members to an environment of misogyny and inappropriate sexual behaviour, I am certain the Headmistresses of the relevant girl's schools would have serious concerns about allowing their students to participate.

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SIGNED by Dr Ian Wilson Paterson

Signature:

Date: February 2015