

STATEMENT OF DAVID COOTE

I, **David Coote** of c/- Corrs Chambers Westgarth, Level 42 ONE ONE ONE, 111 Eagle Street, Brisbane, state as follows:

- 1 I was employed at Brisbane Grammar School (**BGS**) as Deputy Headmaster from January 1979 until September 1983.
- 2 I had been Head of English at Manly Girls High School. I applied for a position at Scots College in Sydney but the position had been filled. I then saw an advertisement for a position as Head of English at Cranbrook School in Sydney. I was appointed to that position. I recall meeting Max Howell while I was at Cranbrook when he was attending some form of Headmasters' meeting at Cranbrook.
- 3 I saw a position advertised for Deputy Headmaster at BGS and I successfully applied for that position. My role as Deputy Headmaster included discipline in the School generally. If a disciplinary matter was of a serious nature I would involve the Headmaster, Mr Max Howell.
- 4 I took up the position of Headmaster at Blue Mountains Grammar School in September 1983 and remained there until the beginning of 1991, when I resigned (to have a six month break) following heart surgery late the previous year.
- 5 After recuperating I was then appointed English teacher at a Marist school, Benedict Senior College at Auburn in Sydney, and stayed there until resigning to begin work as registered migration agent early in 1998.
- 6 I am currently engaged in my own consultancy as a migration agent. I am 78 years of age.

Kevin Lynch

- 7 Kevin Lynch was the school counsellor at BGS during the period I was employed there. We became good friends. I mixed with him socially in the sense that I mixed with him at school events. I did not really see very much of him outside of school events. I met his wife on a few occasions, probably at school functions, but did not really see a lot of her.
- 8 I referred boys to Lynch. I tended to refer any boy I thought was in distress, particularly boys who spoke to me about family problems where family relationships were breaking down. Lynch and I had no formal discussions, and there was no formal reporting by him to me, about the counselling he provided. On occasions, he would mention to me that he was seeing a particular boy. He would not discuss the specifics of the boy's problems, but sometimes he would communicate the fact of him seeing the boy if it was relevant. For example, if there was a serious disciplinary issue with a particular boy, I would discuss that issue with Lynch in case there was some particular background in relation to the boy I should be aware of which meant that I should deal with the boy in a particular way.



9 We did not discuss counselling techniques in any detail. I was aware that he used a conversational style with the boys, and that he did use relaxation tapes and analytical tools such as particular interviewing techniques. I don't recall him ever mentioning to me that he used hypnosis.

10 I never observed Lynch being physically close to any student.

11 After I left BGS I kept in contact with Lynch. We would telephone each other occasionally and exchange Christmas cards. I recall he visited me at least once when I was at Blue Mountains Grammar School. I saw him on a couple of occasions over the years when I returned to Brisbane for work related purposes.

12 I recall Lynch told me he was moving to St Paul's but he did not tell me the circumstances. I was aware that he had separated from his wife at that time.

BQA

13 I recall a student at the school by the name of BQA. I do not remember him well, but I recall that he was one of two brothers. My recollection is he was constantly involved in minor infringements of the school rules, often in respect of uniform.

14 I can recall on one occasion running into Kevin Lynch and he looked quite unwell. I asked if he was unwell and he said that he'd "been called out in the middle of the night for BQA". I do not know, and did not ask, the specifics, but I assume that this meant that BQA parents had contacted him and requested he go out and see BQA during the night.

15 I have been provided with a copy of a letter from the Royal Commission dated 29 October 2015 which sets out the evidence BQA is expected to provide to the Royal Commission which is relevant to me. I respond to the issues raised in that letter as follows:

- (a) I deny that I ever had a conversation with BQA where I questioned him about an "inappropriate sexual relationship" between him and Mr Lynch;
- (b) I deny that I was ever aware of what BQA alleges against Mr Max Howell;
- (c) As I deny that I had any discussion with BQA it follows that I never led him to believe that "the inappropriate relationship was somehow his fault and that he would be punished for it";
- (d) I deny that I suspended or expelled him from the School. I had no authority to suspend or expel students from the School. That authority was vested in Mr Howell alone.

16 I cannot recall the circumstances under which BQA left the school.

17 As to the allegations made in the letter from BQA solicitors dated 24 August 2000, my comments are as follows:

- (a) I never interviewed [BQA] regarding Lynch nor had any conversation with [BQA] about Lynch or his relationship with students;
- (b) I did not say to [BQA] that I had received "concerning reports about Lynch and his relationship with students". I did not discuss any such matters with [BQA] or in fact with Dr Howell. I had no reason to do so because I had no concerns and had not received any concerning reports.

18 I have today been provided with a copy of a statement signed by [BQA] today, 4 November 2015, and respond to the allegations made against me by [BQA] by reference to the paragraph numbers in his statement:

- (a) Paragraph 18: I now have no independent recollection of the incident involving the "matchbox bomb", but that could well have happened and my response could well have been as alleged. Further, it is the sort of incident that I would have reported to the Headmaster.
- (b) Paragraph 24: I have no recollection of an incident involving a semi-automatic .22 rifle. If such an incident occurred, then I am confident I would have been informed about the incident. If I had been informed about such an incident, I would certainly recall it.
- (c) Paragraph 33: as set out in paragraph 15 above, I deny I ever had any such discussion with [BQA]
- (d) Paragraph 34: I deny I had any such conversation with [BQA]
- (e) Paragraph 86: if it is alleged that I have shredded documents that would have supported victims' civil claims, then I deny that allegation. Further, this is the first statement provided by me to the Royal Commission.

No rumours or allegations while at BGS

19 During the period I was employed at BGS I did not hear any rumours or allegations against Kevin Lynch of sexual or any other abuse. Like most large institutions, gossip tended to flow fairly freely around the School. For example, rumours (always, as it turned out, untrue) regularly circulated that the then Headmaster, Dr Howell, was about to resign etc. I am fairly confident that if there were rumours circulating in relation to inappropriate conduct by any teacher (including Lynch), those rumours would have fairly quickly come to my attention, and to the attention of other staff.

First knowledge of allegations against Lynch

- 20 I do not remember who contacted me about Lynch's death or who asked me to give a eulogy at his funeral. It would have been either Gilbert Case (Headmaster of St Paul's) or possibly Lynch's son.
- 21 The first time I became aware of the allegations of improper behaviour by Lynch was on the day of his funeral.



- 22 I first became aware of allegations in relation to BGS towards the middle of 2000. When those allegations first appeared in the Brisbane newspaper, a former student telephoned me in Sydney and told me of it.



DAVID COOTE
DATE: 4/11/2015