

TRIBUNAL OF INQUIRY INTO PROTECTED DISCLOSURES MADE UNDER  
THE PROTECTED DISCLOSURES ACT 2014 AND CERTAIN OTHER  
MATTERS FOLLOWING RESOLUTIONS PASSED BY DÁIL ÉIREANN AND  
SEANAD ÉIREANN ON 16 FEBRUARY 2017

ESTABLISHED BY INSTRUMENT MADE BY THE MINISTER FOR JUSTICE  
AND EQUALITY UNDER THE TRIBUNALS OF INQUIRY (EVIDENCE) ACT  
1921, ON 17 FEBRUARY 2017

SOLE MEMBER: MR. JUSTICE PETER CHARLETON, JUDGE OF THE  
SUPREME COURT

HELD IN DUBLIN CASTLE  
ON WEDNESDAY, 26TH JULY 2017 - DAY 17

17

Gwen Malone Stenography  
Services certify the  
following to be a  
verbatim transcript of  
their stenographic notes  
in the above-named  
action.

---

GWEN MALONE STENOGRAPHY  
SERVICES

APPEARANCES

SOLE MEMBER: MR. JUSTICE PETER CHARLETON,  
JUDGE OF THE SUPREME COURT

REGISTRAR: MR. PETER KAVANAGH

FOR THE TRIBUNAL: MR. DIARMAID MCGUINNESS SC  
MR. PATRICK MARRINAN SC  
MS. KATHLEEN LEADER BL  
MS. ELIZABETH MULLAN, SOLICITOR

FOR MS. D:  
INSTRUCTED BY: MR. THOMAS P HOGAN SC  
MR. NIALL BUCKLEY BL  
MR. KIERAN KELLY  
FANNING & KELLY SOLICITORS  
HATCH HALL  
HATCH STREET LOWER  
SAINT KEVIN'S  
DUBLIN

FOR SGT. McCABE:  
INSTRUCTED BY: MR. MICHAEL McDOWELL SC  
MR. PAUL MCGARRY SC  
MR. BREFFNI GORDON BL  
SEAN COSTELLO & COMPANY  
HALIDAY HOUSE  
32 ARRAN QUAY  
DUBLIN 7

FOR THE COMMISSIONER:  
INSTRUCTED BY: MR. MÍCHEÁL P. O'HIGGINS SC  
MR. CONOR DIGNAM SC  
MR. DONAL MCGUINNESS BL  
MS. KATHY DONALD  
CHIEF STATE SOLICITOR'S OFFICE  
OSMOND HOUSE  
LITTLE SHIP STREET  
DUBLIN 8

FOR THE HSE:  
INSTRUCTED BY: MR. MICHAEL CUSH SC  
MR. JON LEGORBURU  
MR. SEAN O'DONNELL  
MR. REDMOND SCANLON  
BYRNE WALLACE  
88 HARCOURT STREET  
DUBLIN 2

FOR TUSLA:  
INSTRUCTED BY: MR. PAUL ANTHONY McDERMOTT SC  
MS. SARAH MCKECHNIE BL  
ARTHUR COX  
TEN EARLSFORT TERRACE  
DUBLIN 2

FOR ALAN SHATTER: MR. BRIAN GALLAGHER  
GALLAGHER SHATTER SOLICITORS  
4 UPPER ELY PLACE  
DUBLIN 2

FOR RTE: MR. SEAN GILLANE SC  
MR. EAMON KENNEDY BL  
INSTRUCTED BY: MS. PATRICIA HARRINGTON, SOLICITOR

GARDA KEITH HARRISON: MR. MARK HARTY SC  
KILFEATHER SOLICITORS

SUPT. DAVID TAYLOR: MR. MICHAEL O'HIGGINS SC  
MR. JOHN FERRY BL  
INSTRUCTED BY: CARTHAGE CONLON  
MICHAEL E HANAHOE  
SUNLIGHT CHAMBERS  
21 PARLIAMENT STREET  
DUBLIN 2

MS. YVONNE MARTIN: MR. MICHAEL HEGARTY, SOLICITOR

FOR MR. JOHN MCGUINNESS: MR. DARREN LEHANE BL  
INSTRUCTED BY: MR. FINTAN LAWLOR

FOR GARDA MAIRE O'REILLY: MS. CLIONA KIMBER SC  
MR. KEVIN BELL BL  
INSTRUCTED BY: MS. CAOIMHE RYAN  
MORAN & RYAN

FOR THE IRISH TIMES: MR. MARK DUNNE BL  
INSTRUCTED BY: HAYES SOLICITORS  
LAVERY HOUSE  
EARLSFORT TERRACE  
DUBLIN 2

FOR INDEPENDENT NEWS  
AND MEDIA PLC: MR. KIERAN KELLY, SOLICITOR

FOR MS. Y: MR. PAUL GUNNING BL  
INSTRUCTED BY: MS. FIONA BAXTER  
JOHN J. QUINN AND COMPANY  
SOLICITORS  
EARL STREET  
LONGFORD

ASSOCIATED NEWSPAPERS: MR. MICHAEL KEALY, SOLICITOR

FOR PAUL WILLIAMS:

INSTRUCTED BY:

MR. ROSSA FANNING SC  
MR. JOHN FREEMAN BL  
MR. KIERAN KELLY  
FANNING & KELLY SOLICITORS  
HATCH HALL  
HATCH STREET LOWER  
SAINT KEVIN'S  
DUBLIN

FOR ALISON O'REILLY:

MR. FÍONÁN Ó MUIRCHARTAIGH BL

INDEX

<u>WITNESS</u>	<u>PAGE</u>
<b>MS. ROSALIE SMYTH-LYNCH</b>	
DIRECTLY EXAMINED BY MR. MCGUINNESS .....	6
CROSS-EXAMINED BY MR. MCGARRY .....	15
CROSS-EXAMINED BY MR. DONAL MCGUINNESS .....	21
<b>INSPECTOR KAREN DUFFY</b>	
DIRECTLY EXAMINED BY MS. LEADER .....	24
CROSS-EXAMINED BY MR. MCGARRY .....	31
CROSS-EXAMINED BY MR. O'HIGGINS .....	39
RE-EXAMINED BY MS. LEADER .....	41
QUESTIONED BY THE COURT .....	43
FURTHER CROSS-EXAMINED BY MR. O'HIGGINS .....	45
<b>MR. DERMOT MONAGHAN</b>	
DIRECTLY EXAMINED BY MR. MARRINAN .....	45
<b>MS. GAIL PENDERS</b>	
DIRECTLY EXAMINED BY MR. MCGUINNESS .....	48
CROSS-EXAMINED BY MR. MCGARRY .....	60
<b>MS. PATRICIA BANNON</b>	
DIRECTLY EXAMINED BY MS. LEADER .....	64
<b>MR. CORMAC QUINLAN</b>	
DIRECTLY EXAMINED BY MS. LEADER .....	70
CROSS-EXAMINED BY MR. MCGARRY .....	105
CROSS-EXAMINED BY MR. DONAL MCGUINNESS .....	110
RE-EXAMINED BY MS. LEADER .....	115

1 THE HEARING RESUMED, AS FOLLOWS, ON WEDNESDAY, 26TH  
2 JULY 2017:

3  
4 **CHAIRMAN:** Apologies for being late, I couldn't help  
5 that, but I don't have to go back at 2:15 so we can 11:21  
6 just carry on in the normal way.

7 **MR. MARRINAN:** The first witness, Chairman, is Rosalie  
8 Smyth-Lynch, please. Mr. McGuinness's witness.

9  
10 MS. ROSALIE SMYTH-LYNCH, HAVING BEEN SWORN, WAS 11:21  
11 DIRECTLY EXAMINED BY MR. MCGUINNESS:

12  
13 Q. **MR. MCGUINNESS:** Sit down, Ms. Smyth-Lynch. I think  
14 you're a regional general manager dealing with consumer  
15 affairs in the HSE Dublin Northeast, is that correct? 11:22

16 A. That's correct.

17 1 Q. And I think you've completed a number of courses  
18 relevant to your employment in the health service,  
19 including health service management development,  
20 financial management, management accounting, employment 11:22  
21 law, Training the Trainer, Freedom of Information  
22 Basic, Freedom of Information Decisionmaker, Freedom of  
23 Information Advanced, Internal Reviewer, Data  
24 Protection Basic/Advanced and Audit and Research  
25 Ethics, is that correct? 11:22

26 A. That's correct.

27 2 Q. And I think you have extensive experience in a variety  
28 of supervisory roles at different levels in the HSE?

29 A. That's correct.

1 3 Q. And I think you have been in your role as regional  
2 general manager consumer affairs from 2007 to date?  
3 A. To date, that's correct.  
4 4 Q. To date. I think that encompasses the statutory  
5 function of complaints, complaint reviews, Freedom of 11:23  
6 Information, data protection, research ethics manager  
7 and appeals, both statutory and non-statutory?  
8 A. For Dublin Northeast.  
9 5 Q. For Dublin Northeast?  
10 A. Yes. 11:23  
11 6 Q. Now, I think you have been provided with the terms of  
12 reference, and I think you were initially contacted by  
13 your own employers in relation to an email that had  
14 been sent by you in relation to Ms. Fiona Ward in May  
15 2014? 11:23  
16 A. That's correct.  
17 7 Q. And I think you were slightly surprised to be told that  
18 you had some involvement with the Maurice McCabe issue  
19 at all?  
20 A. Yes, I was -- 11:24  
21 8 Q. Is that right?  
22 A. -- very surprised because I hadn't in previous  
23 communication had any knowledge of who was involved,  
24 and it was quite a surprise to get a call from a  
25 national director. 11:24  
26 9 Q. Right. Okay. I think your involvement related to an  
27 incident report that Ms. ward had furnished to you, is  
28 that correct?  
29 A. That's correct.

1 10 Q. And I think it can be seen from the report that neither  
2 Mr. McCabe, Sergeant McCabe, nor Ms. Y, nor Ms. D were  
3 identified in that incident report to you?  
4 A. That is correct.

5 11 Q. I think if we could look at page 3260, it should come 11:24  
6 up on the screen, I think this records an email to you  
7 from Fiona Ward, it's dated 14th May 2014 at 22:06, and  
8 it says:  
9  
10 *"Dear Rosalie, please find attached a report relating 11:25  
11 to a data breach which came to light in the service on  
12 14/5/'14. I have outlined the steps taken to date to  
13 resolve this matter and would welcome your feedback on  
14 any other action that may need to be taken in relation  
15 to the matter."* 11:25  
16  
17 And she gives her phone number. Had you dealt with  
18 Ms. Ward before?  
19 A. Yes. I would have, yeah. It would be routine work in  
20 the Health Service Executive. My function, because all 11:25  
21 of the functions that I cover and provide consultancy  
22 on and training and advice, would encompass Fiona  
23 Ward's functions also. So I would have given advice  
24 and assisted on numerous occasions.

25 12 Q. Okay. Now, can I ask you to look at that incident 11:25  
26 report? It's on page 3262. It's headed:  
27  
28 *"Confidential Rian Counselling Service NCS HSE DNE.  
29 Incident report dated 14/5/'14 re: Data Breach, Rian*



1           *counselling service Cavan."*

2  
3           And it provides a summary in the first instance:

4  
5           *"A report regarding allegations of past abuse made by a* 11:26  
6           *client of the service which contained inaccurate*  
7           *information about the nature of abuse experienced by*  
8           *the client was sent to Child and Family Social Work*  
9           *Services in August 2014. This error came to light*  
10           *following a phone call from the client to their* 11:26  
11           *counsellor-therapist on 14/5/'14. Steps were taken*  
12           *immediately to resolve the issue."*

13  
14           It gives a description of the nature of the incident,  
15           and that concludes on that paragraph saying that: 11:26

16  
17           *"It contained inaccurate information regarding the*  
18           *nature of abuse as reported by the client."*

19  
20           And I think you got that incident report attached to 11:26  
21           the previous email and you considered that on the 15th  
22           May, is that correct?

23           A.   That's correct, yes. On receipt of the email, I  
24           considered it and read it.

25   13   Q.   Yes. 11:27

26           A.   And I tried to contact Fiona Ward.

27   14   Q.   Now, the Tribunal has seen this and Ms. Ward has given  
28           her evidence in relation to it. It is correct to say  
29           that Sergeant McCabe isn't identified in that, nor is

1 the person against whom the allegation was made.  
2 They're not identified as a member of an Garda in that?

3 A. There's no identifying details on it whatsoever.

4 15 Q. Yes.

5 A. It just refers to a client of the service. 11:27

6 16 Q. Yes. And I take it that you understood that Ms. Ward  
7 was informing you about the counselling report having  
8 been sent to the social services in Cavan?

9 A. I don't think she said Cavan in the report.

10 17 Q. Right. 11:28

11 A. I don't think she identified. Maybe she did.

12 18 Q. Yes.

13 A. I don't think she did identify the area.

14 19 Q. Yes.

15 A. She just advised that it had been sent to the social 11:28  
16 work service and the Gardaí.

17 20 Q. The fourth paragraph seems to imply that it probably  
18 had been. It says:  
19

20 *"This report has also been forwarded to the Gardaí in 11:28  
21 Cavan by the social work service as per HSE child  
22 protection policy. The client requested that a copy of  
23 the corrected report be provided to the Gardaí."*  
24

25 But did you understand that the error that the Gardaí 11:28  
26 were notified about related to the nature of the abuse  
27 recorded in the notification sent to them?

28 A. No, I had no knowledge of a notification.

29 21 Q. Pardon?

1 A. I had no knowledge of a notification.

2 22 Q. Yes.

3 A. I just had this report here that's displayed on the  
4 screen.

5 23 Q. Yes. But you certainly understood that the report made 11:28  
6 by the counsellor contained inaccurate information  
7 about the nature of the abuse?

8 A. I did.

9 24 Q. Yes. And I think you formed a view on that and I think  
10 you made handwritten notes on your own file copy of 11:29  
11 that?

12 A. That's correct.

13 25 Q. Perhaps you would just read those notes for us at page  
14 3263.

15 A. First of all, I have written a handwritten note 11:29  
16 following the sentence:  
17  
18 *"They have been asked to remove this report from the*  
19 *file and shred it."*

20 11:29

21 And my handwritten note reads:  
22  
23 *"No, return to Rian for destruction."*  
24

25 And by that I would have meant Rian Counselling. 11:29

26 26 Q. Okay. And then what have you recorded next?

27 A. Next: *"Advised to retrieve inaccurate report. Meet*  
28 *with child and family social worker."*  
29

1           which is Tusla now.

2

3           *"Hand over report and take back first report. Ensure*  
4           *no copies retained. Also to contact Gardaí and get*  
5           *back inaccurate report and confirmation no copy kept by* 11:30  
6           *Gardaí. How serious/could it be --"*

7   27   Q.   Is that "used"?

8           A.   " -- used in a Court - yes."

9   28   Q.   And you did email back Ms. Ward on the 15th. Perhaps  
10           we will just look at that. 3260. what conclusion did 11:30  
11           you come to?

12           A.   Well, first of all, her query was whether they needed  
13           to write to the clients and advise them that there had  
14           been a data breach. So, having read the report a few  
15           times, and I tried to contact Fiona just to discuss it 11:30  
16           with her, it was evident that there was no breach of  
17           data protection, in that there was nobody actually  
18           identified in the report. She had provided the  
19           information in the report that the surname was the only  
20           identifier, and also, that all of the rest, the 11:31  
21           remainder of the report was accurate.

22   29   Q.   Yes. And --

23           A.   So, in consideration of, you know, personal  
24           information, I considered there was no identifier there  
25           to identify anyone to associate them with the data. 11:31

26   30   Q.   All right. well, you were obviously anxious to ensure  
27           that the incorrect data could be retrieved from any  
28           report that had been sent. Did you discuss that issue  
29           with Ms. ward then?

1 A. When I eventually got to speak with Ms. Ward, I did,  
2 because I felt that -- I understood that this was a  
3 report that had been prepared, and I remember -- I  
4 recall at the time thinking that it was a report for  
5 court, you know, or that it was a report around an 11:31  
6 incident that had occurred. So when I actually put it  
7 to Fiona Ward could it end up in court, more or less,  
8 and she said yes, possibly. I recall her saying that.  
9 And I said, well, we need to get the reports back and I  
10 would advise that you get the reports back and link in 11:32  
11 with the social worker, meet with the Social Work  
12 Department to retrieve the reports.

13 31 Q. Yes. And I think in your statement you quote that you  
14 wrote to Fiona Ward on the 16th May of 2014, and  
15 perhaps we could look at the text of that at 3256, at 11:32  
16 the bottom of 3256, going on to 3257. And perhaps you  
17 will just read your reply there into the record of the  
18 proceedings here.

19 A. *"I acknowledge receipt of your email indicating data  
20 breach Rian Counselling Service. Having examined the 11:33  
21 detail of the report, I can confirm that this incident  
22 is not a data protection breach. As you have  
23 indicated, that the surname of the person concerned is  
24 the only identifier, which was released in error.  
25 Therefore, it would not be possible to associate the 11:33  
26 data to any particular individual as sufficient  
27 personal identifiable information has not been  
28 forwarded as indicated in your communication. On that  
29 basis, it will not be necessary to write to the client*

1 *concerned as it would be impossible to identify them*  
2 *from the detail as explained in your correspondence.*  
3 *It will, however, be necessary to retrieve the reports*  
4 *in the social work service, An Garda Síochána and NCS*  
5 *(which is National Counselling Service) and to have* 11:33  
6 *same shredded accordingly. Please note the shredding*  
7 *of the report should not be undertaken by National*  
8 *Counselling Service. However, the report should be*  
9 *returned to your service for appropriate shredding*  
10 *disposal."* 11:33

11 32 Q. I think you followed up that with a phone call to Fiona  
12 ward, who advised you that the Gardaí were not inclined  
13 to return the report and that they still retained the  
14 same. I think you became aware that the counsellor had  
15 written to the Gardaí in that respect? 11:34

16 A. Yes. If I recall correctly, Fiona ward's first letter  
17 or report to me indicated that they were emailing --  
18 that there were actions and that they were emailing the  
19 social work service. And during our telephone  
20 conversation I believed that that had already occurred. 11:34

21 33 Q. Yes.

22 A. And -- sorry.

23 34 Q. Can you confirm to me that in the course of those  
24 telephone conversations you still weren't aware of the  
25 identity of any of the parties concerned? 11:34

26 A. No, and I didn't ask them. And I suppose in  
27 consideration of the confidentiality of the Rian  
28 Counselling Service and the mutuality of  
29 confidentiality that exists in that service, I wouldn't

1 have pursued it. If information had been given to me  
2 voluntarily, I perhaps may have noted it, I may not,  
3 because this would be routine work for us. But in  
4 relation to confidentiality and the service that was at  
5 question, I wouldn't have pursued the identity because 11:35  
6 my advice would have been the same.

7 35 Q. Yes. You didn't need to know?  
8 A. I didn't need to know, exactly.

9 36 Q. You weren't told the identity by the other -- by  
10 Ms. Ward or anyone else? 11:35  
11 A. No, of anybody.

12 37 Q. Yes. And you certainly weren't in a position to  
13 disseminate any information, and you didn't do so?  
14 A. Disseminate any information?

15 38 Q. To any unauthorised person yourself? 11:35  
16 A. Oh, absolutely not.

17 **MR. MCGUINNESS:** Thank you. would you answer any  
18 questions.

19 **CHAIRMAN:** Do you have any questions?

20 **MR. MCGARRY:** Just a couple of questions. 11:35  
21

22 **MS. SMYTH-LYNCH WAS CROSS-EXAMINED BY MR. MCGARRY:**  
23

24 39 Q. **MR. MCGARRY:** Paul McGarry is my name. I am one of the  
25 counsel for Sergeant McCabe. 11:35  
26 **CHAIRMAN:** Mr. McGarry, would you switch on your  
27 microphone. It's Mr. McDowell's microphone that is on.  
28 Thanks.

29 40 Q. **MR. MCGARRY:** You were looking just at the report that

1           you had been given by Fiona Ward, is that right?

2           A.    That's right, yes.

3    41   Q.    Okay. So you were, in effect, taking Fiona Ward's word  
4           for what the true position was with regard to the data  
5           breach, is that right? 11:36

6           A.    Absolutely, yes.

7    42   Q.    You said in your response, this is the top of 3257:  
8  
9           *"As you have indicated that the surname of the person  
10          concerned is the only identifier released in error,  
11          therefore it would not be possible to associate the  
12          data to any particular individual as sufficient  
13          personal identifiable information has not been  
14          forwarded as indicated in your communication."* 11:36

15  
16           Is that, in effect, what you gleaned from the report of  
17           Fiona Ward?

18           A.    Yes. The report of Fiona Ward clearly indicated that  
19           the majority of the report that she referred to was  
20           correct. She referred to a report also and that it was 11:36  
21           only the description of abuse that was incorrect and  
22           the identifier within the description of abuse was only  
23           a surname.

24    43   Q.    But did you not think it would be a good idea to check  
25           by taking a look at the file or the documents that 11:37  
26           Fiona Ward had been looking at, before you came to that  
27           conclusion?

28           A.    Well, I understood that Fiona Ward was also looking at  
29           a report.



1 44 Q. But you were the person responsible for dealing with  
2 the data breach, because this report was to you to deal  
3 with that issue, isn't that right?  
4 A. Well, you're dealing with data protection. As a data  
5 controller, you are a controller of data -- 11:37  
6 45 Q. Sure.  
7 A. -- in consultation with other controllers who actually  
8 control the data. The data would have been in the  
9 control of Fiona Ward.  
10 46 Q. Did you ask her to elaborate on that in the phone 11:37  
11 conversations that you had with her?  
12 A. No, I would have checked with Fiona Ward at the time  
13 were there any other identifiers, and my recall is that  
14 there definitely were no other identifiers and that the  
15 rest of the report was correct, and that's the 11:37  
16 information. I was given the advice on the information  
17 as had been provided to me.  
18 47 Q. It's just that on the -- you said in your statement  
19 that "*On the 15th May,*" you said, "*I made many attempts*  
20 *to contact Fiona Ward.*" That suggests that you were 11:38  
21 very concerned about this issue and wanted to get to  
22 the bottom of it quickly?  
23 A. I was concerned to the point of view that I would have  
24 thought that possibly meet with the social workers and  
25 the Gardaí and retrieve the report, and I wanted to 11:38  
26 speak with her to just make that point and suggest  
27 actions. I didn't purposefully put that in my letter  
28 at the time. She did come back to me on the evening  
29 and advise that she would try and contact me the next

1 day.

2 48 Q. would it be normal for you to go to that extreme; as  
3 you say, many attempts to call her, all efforts were  
4 unsuccessful and then sending an email at quarter to  
5 six in the evening by way of follow-up, would that be a 11:38  
6 normal thing for you to do in respect of a data breach?

7 A. It would be, yes. You know, it would be in any  
8 functions where we would have inquiry and advice, we  
9 would always follow up with a phone call and, you know,  
10 given the detail and the fact that I had in my thought 11:39  
11 that maybe we should meet with the social workers and  
12 Gardaí, retrieve the report, that's the reason I would  
13 have followed up. So I would have left it until the  
14 end of the day and possibly cross my desk again, and  
15 would tidy up phone calls at the end of the day, and it 11:39  
16 wouldn't be unusual.

17 49 Q. And again, you had a number of telephone conversations  
18 subsequently, so this is something that's clearly  
19 bothering you very seriously or significantly?

20 A. It was being reported as a breach. It wasn't really a 11:39  
21 data protection breach. I would follow up as per  
22 routine, it would be routine work to follow up with  
23 reporters of any incidents. Likewise, we would take  
24 calls frequently from members of the public. Like, we  
25 would have extensive interactions on a weekly basis, 11:40  
26 and we would follow up with phone calls. We would  
27 return phone calls.

28 50 Q. And is that why there's a reference to a fear or a  
29 difficulty, you said, about going to court. You said:

1           *"This report file would be serious enough to find its*  
2           *way to court."*

3  
4           what sort of a court were you talking about?

5           A.   well, I recall from looking at the report and then my           11:40  
6           subsequent communication with Fiona Ward, I had an  
7           opinion that, you know, this was a report that had been  
8           done as part of maybe a court process and I think  
9           possibly by the fact that I was advised it had gone to  
10          the Gardaí and the Gardaí had, as Fiona Ward had said,           11:40  
11          they hadn't got the report back, and then in subsequent  
12          follow-up phone calls, I think I had a total of three  
13          phone calls. I had one phone call and then I sort of  
14          recall putting down the phone and doing a follow-up  
15          quite quickly, and then I had another phone call maybe           11:41  
16          a day or two later, and at that time Fiona had  
17          identified that the Gardaí were not inclined to give  
18          back the report, and I advised then to write to the  
19          chief superintendent.

20          51   Q.   So the court you're referring to there is a criminal           11:41  
21          procedure or a criminal proceeding arising from what  
22          was in the --

23          A.   I hadn't given it that much thought, to be truthful,  
24          but I was concerned that an inaccurate report may be in  
25          another body or agency, and also the fact that we had           11:41  
26          actually corrected it in the HSE, so it would be very  
27          important that there wasn't an incorrect report out  
28          there. It's the responsibility of us all to keep  
29          information accurate and up-to-date, and also, I would

1 have been thinking of the principles of data  
2 protection. While I have said it wasn't a data  
3 protection breach, we must comply with the principles  
4 of data protection.

5 52 Q. So was the reference to court possibly also a reference 11:41  
6 to a concern about the data breach ending up in court?  
7 A. No.

8 53 Q. It just seems from your last answer that that was a  
9 concern that you also had: make sure that you weren't  
10 accused or in danger of being accused of being involved 11:42  
11 in the data breach?  
12 A. That didn't enter my mind at all.

13 54 Q. Well, as far as you were concerned, the information  
14 that you had was only the information that was provided  
15 to you in the short letter and the telephone 11:42  
16 conversations from Fiona ward?  
17 A. The information I had, and I wouldn't have considered  
18 Fiona ward's report a short letter, it's quite a  
19 detailed report, and it did actually identify actions  
20 which she had undertaken at that time. 11:42

21 55 Q. Yes. But it's just telling you things, it's not  
22 providing you with the underlying documents that are in  
23 the background, isn't that right?  
24 A. It's not. But as I have identified, that wouldn't be  
25 unusual. 11:42

26 56 Q. Thank you.

27 **MR. CUSH:** I have no questions, Chairman. Thank you.  
28 **MR. DONAL MCGUINNESS:** Chairman, I just have one quick  
29 question.

1 MS. SMYTH-LYNCH WAS CROSS-EXAMINED BY MR. DONAL

2 McGUINNESS:

3

4 57 Q. **MR. DONAL MCGUINNESS:** Ms. Lynch, my name is Donal  
5 McGuinness. I represent, along with other counsel, the 11:43  
6 Garda Commissioner and various other members of the  
7 Gardaí. Could I just ask you to confirm that  
8 essentially, from your point of view looking out for  
9 the HSE, you were anxious to ensure that any damage to  
10 the HSE was limited, that was really one of your main 11:43  
11 objectives in the recovery of this document?

12 A. I would have been concerned about damage to the client,  
13 also.

14 58 Q. Yes.

15 A. You know, an incorrect report had gone. So I reckoned 11:43  
16 that it was best to get the incorrect report back and  
17 to replace it with a correct report.

18 59 Q. Yes. And you understand that in relation to the  
19 incorrect report there was a notification to the Gardaí  
20 which used information from the incorrect report, a 11:43  
21 notification of child abuse, suspected child abuse?

22 A. Can you repeat that, please?

23 60 Q. You understand that the document that was generated by  
24 Ms. Brophy was used to populate another form that was  
25 sent to the Gardaí, which was a notification of 11:44  
26 suspected child abuse?

27 A. I wouldn't have known that at the time. But having  
28 reviewed the disclosure documents for the Tribunal, I  
29 am aware now that there was a notification document.

1 61 Q. Yes.

2 A. And I would have understood at the time that the report  
3 had been -- had gone to the Gardaí and it had gone to  
4 the social workers in Child and Family or Tusla.

5 62 Q. Yes, but the actual report that had gone to the Gardaí 11:44  
6 wasn't the document that came from Ms. Brophy, did you  
7 understand that?

8 A. I didn't know that, no.

9 63 Q. No. Do you understand that now?

10 A. I do. From reviewing the Tribunal documents, I have 11:44  
11 seen the notification that was written. Now, are you  
12 referring to the notification from Tusla to the Gardaí?

13 64 Q. Yes.

14 A. Okay. No, I wouldn't have been familiar with that at  
15 all. I wouldn't have seen that. I didn't know 11:44  
16 anything about that. I was only involved in the report  
17 that Fiona Ward provided to me and, as I've identified  
18 there earlier, I was aware then that there was a  
19 notification done. But I understood it was the report.  
20 And that's where my query came in to -- which I've 11:45  
21 addressed a few minutes ago.

22 65 Q. Yes, but the actual sequence of events was that  
23 Ms. Brophy's notification was sent on, that the  
24 notification to the Gardaí was then populated with the  
25 information that came from that report and that was 11:45  
26 sent on, dated 3rd May 2014, to the Garda. Now, can I  
27 just ask you to look at document 1716. Sorry, 1716.  
28 This is the document that was sent by Tusla to the  
29 Garda Síochána, and it's a notification of suspected

1 child abuse. And it was received in the Garda  
2 Síochána's office, in the superintendent's office on  
3 the 7th May 2014 and it's dated 2nd May 2014. This is  
4 a document that I have been referring to.

5 A. Okay. 11:46

6 66 Q. And this contains the incorrect allegation. And this  
7 was the document that the Gardaí essentially refused to  
8 return or shred because the Gardaí considered that this  
9 was a record.

10 A. This was the document that the Gardaí received from 11:46  
11 Tusla?

12 67 Q. Yes.

13 A. Okay.

14 68 Q. And that the Gardaí decided that it was inappropriate,  
15 the assistant commissioner concerned considered that it 11:47  
16 was inappropriate to shred this document or to return  
17 it because it was a record of a notification of  
18 suspected child abuse that had been sent to the Gardaí.  
19 Do you understand?

20 A. Yes. 11:47

21 69 Q. **CHAIRMAN:** well, if it helps, I'm certainly not going  
22 to make any adverse comment in relation to that. I  
23 mean, that is a very reasonable point of view, it seems  
24 to me --

25 **MR. DONAL MCGUINNESS:** Very good, Chairman. 11:47

26 **CHAIRMAN:** -- to keep a record on the file as to what  
27 has happened. Now, as to what use you make of it is a  
28 different matter, but that is sensible thing to do.

29 **MR. DONAL MCGUINNESS:** Very good, Chairman. Thank you.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29

**CHAIRMAN:** Thank you very much.

**THE WITNESS THEN WITHDREW.**

**MS. LEADER:** The next witness, sir, is Inspector Karen Duffy. 11:47

**INSPECTOR KAREN DUFFY, HAVING BEEN SWORN, WAS DIRECTLY EXAMINED BY MS. LEADER:**

**MS. LEADER:** Inspector Duffy's statement is in volume 11 of the materials at page 3285. 11:48

70 Q. Inspector Duffy, I understand you are presently attached to the assistant commissioner's office in the Northern Region and that's based in Sligo Garda Station? 11:48

A. That is correct.

71 Q. And if you wouldn't mind outlining a history of your career in An Garda Síochána to date, please.

A. Certainly. I joined An Garda Síochána in October 2001 and went to the Garda College, where I did my training. I was attested the following November, in 2002, and I would have went to Mountjoy Garda Station for 'operation Freeflow' for approximately a period of two months, where we were directing traffic, and that, for the Christmas period, and parking fines and such. And mid-January 2003 I was sent to Sligo Garda Station. I was a guard in Sligo Garda Station on the regular, up until approximately 2006/2007, when I was requested to 11:49



1 perform duty at the assistant commissioner's office,  
2 and I was assigned there, and I was promoted to the  
3 rank of sergeant in 2009 and was assigned as the  
4 sergeant in the assistant commissioner's office, and in  
5 August 2016 I was promoted to the rank of inspector and 11:49  
6 retained in the assistant commissioner's office in  
7 Sligo.

8 72 Q. So you're fairly familiar with the workings of the  
9 assistant commissioner's office, it would be fair to  
10 say? 11:50

11 A. Yes.

12 73 Q. And I think in 2014 you were the acting inspector in  
13 the assistant commissioner's office in the Northern  
14 Region, is that correct?

15 A. That would be correct, Chairman. The inspector that 11:50  
16 was there before me got promoted in May 2013 and  
17 Assistant Commissioner Kenny requested that I perform  
18 the duties of the acting inspector from 2013 -- sorry,  
19 from whenever the inspector got promoted in 2013 until  
20 I got promoted in August of last year, although 11:50  
21 Assistant Commissioner Kenny retired in April of '16.

22 74 Q. Okay. Could you explain to the Tribunal what your  
23 duties were in the assistant commissioner's office?

24 A. My duties would be the general running of the office,  
25 day-to-day dealing with telephone calls, correspondence 11:50  
26 coming in, drafting correspondence for the assistant  
27 commissioner, dealing with confidential matters that  
28 only Garda members can deal with, arranging his diary,  
29 organising meetings for him, generally day-to-day

1 running of the office.

2 75 Q. And besides yourself, how many other people worked in  
3 the assistant commissioner's office?

4 A. In the assistant commissioner's office there are three  
5 civilian members of staff, myself, and there is a 11:51  
6 sergeant, but that sergeant is currently doing other  
7 duties.

8 76 Q. Now, yesterday, Assistant Commissioner Kenny gave  
9 evidence in relation to dealings he had with a  
10 notification he received from the chief superintendent 11:51  
11 in Monaghan. Were you here when he gave his evidence?

12 A. I was here for some of it, yes, and I have read the  
13 transcripts.

14 77 Q. I think he directed you on occasion to reply to certain  
15 correspondence, is that correct? 11:51

16 A. That would be correct, yes.

17 78 Q. And you followed his directions in relation to that?

18 A. Absolutely, Chairman.

19 79 Q. And I don't intend going through all of the  
20 correspondence with you, but in relation to the 11:52  
21 correspondence that went between the assistant  
22 commissioner's office and the chief superintendent's  
23 office and also the assistant commissioner's office and  
24 the Commissioner's office in Dublin, did you follow his  
25 directions in relation to that and actually write the 11:52  
26 correspondence?

27 A. Absolutely. Any directions or request that Assistant  
28 Commissioner Kenny requested me to do, I duly did same.  
29 If he requested me to, you know, write or type a minute

1 for him, I typed it. He always signed it. And it was  
2 sent off at his request.

3 80 Q. And in relation to the correspondence that was opened  
4 to the Tribunal yesterday, obviously you were familiar  
5 with it, is that correct? 11:52

6 A. That is correct, Chairman.

7 81 Q. Did you discuss that correspondence with any other  
8 member of An Garda Síochána?

9 A. Absolutely not.

10 82 Q. Okay. And do you know did other members of the 11:52  
11 assistant commissioner's office have access to that  
12 correspondence?

13 A. No, the only people who would have access to that  
14 correspondence, or that file, as I refer to it, would  
15 have been Assistant Commissioner Kenny and myself. 11:53

16 83 Q. And how are you so sure of that?

17 A. Well, it would either have been kept confidentially in  
18 a locker beside my desk or in the assistant  
19 commissioner's desk or in his locker.

20 84 Q. And only you had access to the assistant commissioner's 11:53  
21 materials?

22 A. I wouldn't have access to the assistant commissioner's  
23 locker. I mean, I would have had access to his office  
24 per se, but, I mean, his desk would have been clear,  
25 there would have been no correspondence on it, or 11:53  
26 anything like that.

27 85 Q. Now, there are two small areas that I want you to deal  
28 with, Inspector Duffy. First of all, when the  
29 notification was received from Chief Superintendent

1 Sheridan, that's on his letter of the 16th May 2014.  
2 That's at page 3291 of the materials. It should come  
3 up in front of you. You sent that, it would appear, by  
4 email to the Commissioner's office on the 16th May  
5 2014, is that correct? 11:54

6 A. That's correct, Chairman. This correspondence would  
7 have arrived at the office and I would have typed this  
8 minute at the request of Assistant Commissioner Kenny.  
9 He duly signed same and he requested me to send it off  
10 on his behalf to the Commissioner's office in Garda 11:54  
11 Headquarters, which I duly did. I sent it to the  
12 Commissioner's private secretary, which would have been  
13 Superintendent Frank Walsh at the time.

14 86 Q. Okay. And insofar as he seemed to be slightly critical  
15 of Chief Superintendent Sheridan for sending other 11:54  
16 correspondence via email to him, did he have any  
17 difficulty with you in sending material by email to the  
18 Commissioner's office?

19 A. Assistant Commissioner Kenny had a strong view in terms  
20 of email and written correspondence. He was very much 11:55  
21 of the view that he would write a minute and it would  
22 be signed by him and I would send the email off with  
23 his attached correspondence.

24 87 Q. Yes.

25 A. He had no issue with that. He certainly did have an 11:55  
26 issue with somebody just loosely sending an email and  
27 not having a signed document attached to it.

28 88 Q. Okay. Was that generally known or was it something you  
29 would be more familiar with?

1 A. It was something I would have been familiar with, but  
2 he certainly would have expressed his views about it to  
3 his management team.

4 89 Q. Okay. Now, you'll realise at this stage, Inspector  
5 Duffy, that the Commissioner's office in Dublin wasn't 11:55  
6 notified that there had been an error in the  
7 notification form on any formal level, you understand  
8 that from yesterday's evidence?

9 A. I do, Chairman.

10 90 Q. And insofar as it has been suggested by the assistant 11:56  
11 commissioner who gave evidence yesterday that he would  
12 have expected his office to deal with matters that came  
13 in, and perhaps forward it to the Commissioner's  
14 office, did you understand that to be any part of your  
15 duties, to forward correspondence from Chief 11:56  
16 Superintendent Sheridan to the Commissioner's office,  
17 without being directed by the assistant commissioner to  
18 do so?

19 A. Absolutely not. I certainly would -- I was a sergeant  
20 at that time. I certainly would have had no authority 11:56  
21 or autonomy to send something of such grave nature to  
22 the Commissioner's office without being directed or  
23 requested by the assistant commissioner to do so. It's  
24 evident that he had dealt with all other correspondence  
25 in relation to this matter and was quite adamant that 11:56  
26 it was all to be signed correspondence, which he duly  
27 signed, and it was all to be sent as attachments. So I  
28 certainly had received no instruction or direction from  
29 Assistant Commissioner Kenny to send something like





1 A. We would have a lot of different correspondence coming  
2 through our office in relation to very serious crime,  
3 murders, discipline in relation to Garda members,  
4 alleged criminality against Garda members, and  
5 certainly there would have been occasions where you 11:59  
6 probably would have notified the Commissioner's office  
7 of maybe an alleged criminal offence where Garda  
8 members were involved or very serious discipline.

9 100 Q. You see, in this case, the notification comes in to you  
10 on the 16th and on the same day you're sending an email 12:00  
11 with a note signed by Assistant Commissioner Kenny  
12 himself, so I'm suggesting to you that this was a very  
13 serious issue that required you to immediately or he to  
14 immediately notify the Commissioner.

15 A. Well, that's something Assistant Commissioner Kenny 12:00  
16 would have to address. My role really was his regional  
17 clerk. I mean, I brought the correspondence to his  
18 attention. He requested me to type this minute up. I  
19 typed the minute up. I gave it back to Assistant  
20 Commissioner Kenny and he signed it. And I duly sent 12:00  
21 same off to the Commissioner's office.

22 101 Q. Was it because the documentation, the information he  
23 had been given, related to a serving member of the  
24 force that it required to go to the Commissioner's  
25 office? 12:01

26 A. Again, I think that's something only Assistant  
27 Commissioner Kenny can only answer. My role, as I  
28 said, was the regional clerk. I typed up the  
29 correspondence, as Assistant Commissioner Kenny had



1 requested me to do so.

2 102 Q. well, in your experience of dealing with him, you  
3 mentioned the circumstances in which he might be  
4 required to send things to the Commissioner's office,  
5 serious crimes being committed, murders, and so on, 12:01  
6 obviously, but this wasn't of that character, this was  
7 a notification in relation to a child abuse issue. I  
8 am suggesting to you that the reason why it was deemed  
9 urgent in the sense that it had to be sent straight up  
10 to the Commissioner's office was because it referred to 12:01  
11 an existing serving member?

12 A. Again, that would be something that Assistant  
13 Commissioner Kenny would answer.

14 103 Q. Did he dictate the note to the Commissioner's office to  
15 you to type? 12:01

16 A. Yes.

17 104 Q. And did he dictate it into a dictaphone or did he stand  
18 over you or did he scribble it out on a piece of paper?

19 A. He would use maybe handwritten notes, and then I would  
20 give him the correspondence and he would say 'I'm happy 12:02  
21 with that' and would sign it.

22 105 Q. We don't have those handwritten notes?

23 A. No, they would be really, I suppose, a scrap of paper,  
24 for a better word, or a rough draft.

25 106 Q. Did you read the documents attached to Chief 12:02  
26 Superintendent Sheridan's report?

27 A. I would have glanced at them. I wouldn't have read  
28 them in depth as Assistant Commissioner Kenny would  
29 have, but I certainly was aware of what they were.

1 107 Q. And you were aware of what was involved from looking at  
2 them?

3 A. I was aware that it was a Tusla or a HSE referral.

4 108 Q. Of a very serious allegation of sexual abuse?

5 A. Yes. 12:02

6 109 Q. Involving a member of the force?

7 A. Yes.

8 110 Q. Yes. How did the meeting in Mullingar come to be  
9 organised?

10 A. There was further correspondence that came in from 12:03  
11 Chief Superintendent Sheridan, I think it was the 23rd  
12 May and then further correspondence on the 29th May,  
13 and the assistant commissioner then decided to organise  
14 a meeting that was to be held in Sligo on the 16th  
15 June, but that meeting did not take place and he 12:03  
16 requested for Chief Superintendent Jim Sheridan of the  
17 Cavan-Monaghan division and Superintendent Leo McGinn  
18 from Bailieboro to be in attendance.

19 111 Q. And you communicated with them that they were required  
20 to attend at a meeting? 12:03

21 A. No, I did not communicate. Assistant Commissioner  
22 Kenny drafted a minute, he signed it, and it was sent  
23 back to the chief superintendent in Cavan-Monaghan,  
24 requesting for himself and for Superintendent Leo  
25 McGinn to be in attendance at the meeting, Chairman. 12:03

26 112 Q. This was a meeting that was convened specially to deal  
27 with this issue?

28 A. It was a meeting that AC Kenny had organised to --  
29 obviously to discuss this matter.

1 113 Q. And it was scheduled to take place in a garda station  
2 in which none of the people who were involved were  
3 stationed?  
4 A. None of the people involved were stationed in Sligo,  
5 yes. 12:04  
6 114 Q. Except, of course, Sergeant McCabe was stationed there  
7 at the time, isn't that right?  
8 A. Well, the meeting had initially been scheduled for  
9 Sligo and then it was reconvened to take place on the  
10 16th July in Mullingar. 12:04  
11 115 Q. Yes. I think Assistant Commissioner Kenny was doing a  
12 couple of days in Mullingar around that time, was he?  
13 A. He was. He was in charge of the Eastern Region, which  
14 is based in Mullingar, and obviously the Northern  
15 Region in Sligo. 12:04  
16 116 Q. Would you normally go along to meetings that he would  
17 have with subordinate officers, to take a note?  
18 A. Yes. The regional inspector -- I wouldn't have went  
19 when I would have been a sergeant, only on the occasion  
20 where the inspector would have been on leave or maybe 12:04  
21 unavailable to attend. But the regional inspector  
22 would go, as most divisional clerks would go with the  
23 chief superintendents and district clerks would go with  
24 the superintendents, to record notes or maybe action  
25 anything that would require to come out of same. 12:05  
26 117 Q. You took notes, you said in your statement, at the  
27 meeting?  
28 A. That is correct.  
29 118 Q. And you said in your statement that when you got back

1 to Sligo, you showed them immediately to Assistant  
2 Commissioner Kenny?

3 A. That is correct.

4 119 Q. And that he agreed that they were an accurate account  
5 of the meeting and you put the notes on the file? 12:05

6 A. That is correct, Chairman.

7 120 Q. We don't have a copy of those handwritten notes at the  
8 moment?

9 A. No. The policy in the office was, the notes were typed  
10 up immediately and they became, for a better word, the 12:05  
11 true copy or the true original one, that it really was  
12 for legibility reasons, so that if, in ten years' time  
13 or five years' time, somebody wanted to look up the  
14 file, there was a typed version which was more legible.

15 121 Q. So just to be clear, Assistant Commissioner Kenny never 12:06  
16 said anything to you about the accuracy or the  
17 correctness of the notes that you took of the meeting?

18 A. He said to me that they were an accurate account.

19 122 Q. Yes. And that's what you said in your statement?

20 A. Yes. 12:06

21 123 Q. You see, it's just that Assistant Commissioner Kenny  
22 yesterday sought to put a different perspective on  
23 the -- I don't know if you were here for his evidence  
24 yesterday?

25 A. I was here for some of it. 12:06

26 124 Q. Yes. Well, in response to some questions, he sought to  
27 down-play the accuracy of the notes. In fact, on one  
28 occasion he said:  
29

1           *"These notes are Sergeant Duffy's interpretation of*  
2           *what took place at the meeting."*

3  
4           And that was in answer to a question about discussing  
5           Maurice McCabe or contacting or notifying him, I think 12:06  
6           he was -- I'm suggesting that he seemed to be taking  
7           the position that your notes were not accurate to that  
8           extent?

9           A.   As I have said in my statement, my role was solely to  
10           record notes. I recorded the notes as the discussion 12:07  
11           was unfolding. I presented the notes to Assistant  
12           Commissioner Kenny and he said to me that they were  
13           accurate and same was recorded and put on the file.

14 125   Q.   You knew from looking at the documents that what had  
15           been sent to the Commissioner's office was a referral 12:07  
16           from Tusla, forwarded up the line in An Garda Síochána,  
17           all the way to the Commissioner's office, which  
18           contained a false allegation and the false statement  
19           that that allegation had been previously investigated?

20           A.   I wouldn't have been overly aware of the original file 12:07  
21           in terms of the allegations by Ms. D in 2006 and 2007.  
22           I mean, I was a guard in Sligo at that stage. So when  
23           it came in, I brought this piece of correspondence to  
24           the assistant commissioner's attention and he dealt  
25           with same. It's in the manner that he did. 12:08

26 126   Q.   Sure. But the notification that went up to the  
27           commissioner's office and the documents contained in  
28           them, clearly created the impression that the false  
29           allegation had been investigated, isn't that right?

1 A. Like I say --

2 **CHAIRMAN:** Yes, but Inspector Duffy would know  
3 absolutely nothing about that.

4 **MR. MCGARRY:** Sure.

5 **CHAIRMAN:** I mean, that is the problem. Nor would she 12:08  
6 know whether the false allegation coming in is actually  
7 false.

8 **MR. MCGARRY:** Sure.

9 **CHAIRMAN:** I mean, in the sense of being totally  
10 inaccurate and relevant to Ms. Y as opposed to Ms. D. 12:08  
11 Am I right in thinking that, because that is what the  
12 assistant commissioner --

13 A. That would be correct, Chairman.

14 **CHAIRMAN:** That was the impression he had, this is an  
15 amplification of what was there before. Now, some 12:08  
16 people might find that hard to understand, but you  
17 didn't have any better knowledge than that?

18 A. No better knowledge, Chairman.

19 **CHAIRMAN:** Yes.

20 127 Q. **MR. MCGARRY:** Knowing what you know now, did you not 12:08  
21 think it strange that at no stage was there an attempt  
22 to correct that with the Commissioner's office?

23 A. This was Assistant Commissioner Kenny's file. My role  
24 was only to type minutes as his personal assistant or  
25 as the regional clerk, to forward same, on his request, 12:09  
26 to the Commissioner. I mean, I typed anything that he  
27 directed or requested me to do so, and I would imagine  
28 if he had have requested me to do such a thing, he  
29 would have recorded same in his journal. If he had

1 requested me to send something on his behalf, I am sure  
2 he would certainly have recorded that in his officer's  
3 journal. And I would have had no reason to send  
4 something to the Commissioner's office had he requested  
5 me to do so. But I was never requested to do that. 12:09

6 **MR. MCGARRY:** Thank you.

7 **MR. O'HIGGINS:** One or two questions, Chairman.

8  
9 **INSPECTOR DUFFY WAS CROSS-EXAMINED BY MR. O'HIGGINS:**

10  
11 128 Q. **MR. O'HIGGINS:** Inspector, you were perhaps better than 12:09  
12 anybody in a position to -- you're in the best  
13 position, perhaps, to assist the Chairman with  
14 conveying the sense of things in the stations in which  
15 you were located. First of all, can I ask you, in 12:10  
16 2014, at this time did you pick up any sense around you  
17 that there was a conspiracy in An Garda Síochána to do  
18 down Sergeant Maurice McCabe?

19 A. Certainly not.

20 129 Q. Were you involved in any campaign to sully Sergeant 12:10  
21 Maurice McCabe?

22 A. Certainly not.

23 130 Q. Were you at the epicentre of a conspiracy to blacken  
24 Sergeant McCabe?

25 A. Certainly not. 12:10

26 131 Q. You have told us that the initial meeting, the initial  
27 intention of former Assistant Commissioner Kenny was  
28 that the meeting would be held in Sligo on the 16th  
29 June?

1 A. That's correct, Chairman.

2 132 Q. We're all agreed, I think, that didn't go ahead, and it  
3 went ahead a month later in Mullingar?

4 A. I can't recall why that meeting didn't go ahead. I  
5 think it was mainly due to people not being available 12:11  
6 and operational demands on all parties concerned.

7 133 Q. All right. Mr. McGarry was inquiring as to why or is  
8 there any significance attaching to the meeting that  
9 went ahead taking place in Mullingar. Is there?

10 A. Well, Assistant Commissioner Kenny had an office in 12:11  
11 Mullingar and it would be, you know, a smaller annex in  
12 the station. That is solely why, really, it was held  
13 in Mullingar, and plus, he had had an earlier meeting  
14 that morning.

15 134 Q. All right. Can I ask you again in terms of the sense 12:12  
16 of things and the mood at the meeting in Mullingar,  
17 perhaps, which may perhaps have had too much attention  
18 already or in terms of its significance, but that will  
19 be a matter for the Chairman. At that meeting, you  
20 were notetaker. Are you in a position -- you were 12:12  
21 present at the meeting, isn't that right?

22 A. I was. The meeting commenced at 2:30 and ended at  
23 3:10, Chairman, and I was present for that period.

24 135 Q. Did you get any sense at that meeting that the  
25 participants at the meeting were concerned to see how 12:12  
26 we can conspire to get at Maurice McCabe?

27 A. No.

28 **CHAIRMAN:** Mr. O'Higgins, I am intending to be helpful  
29 by making this comment. It's one that doesn't just



1 apply to you, but effectively to everybody in the room.  
2 And by asking a question the answer to which is  
3 obviously 'yes' or obviously 'no', is not really  
4 helping me a huge amount. I mean, you will find  
5 references to that in the relevant textbooks on 12:13  
6 evidence. I appreciate that there are times when  
7 counsel should definitely lead, and I do understand  
8 that it's necessary for you to deal with the issue that  
9 either this witness or any other was not at the  
10 epicentre of a conspiracy to blacken Sergeant McCabe, 12:13  
11 appreciating as well that there are certain items that  
12 have gone through that are now common case. There are  
13 times, however, when it does help to ask a more  
14 open-ended question. And that is only a suggestion,  
15 Mr. O'Higgins. 12:13

16 **MR. O'HIGGINS:** May it please you, Chairman. I  
17 appreciate the indication.

18 136 Q. Just dealing with matters more specifically then,  
19 Inspector. For instance, at the meeting in Mullingar  
20 at which you were notetaker, at any point were you 12:13  
21 directed to stop taking notes so that there could be  
22 things said that would go unrecorded?

23 A. No.

24 **MR. O'HIGGINS:** Thanks very much.

25 **CHAIRMAN:** Unless you had any questions. Is there 12:14  
26 something?

27 **MS. LEADER:** Just one question.

28

29 **INSPECTOR DUFFY WAS RE-EXAMINED BY MS. LEADER:**

1

2 137 Q. **MS. LEADER:** It would appear that the assistant  
3 commissioner had one thing to do after the meeting, and  
4 that was to seek legal advice, and that was never  
5 followed up by the assistant commissioner. You heard 12:14  
6 that yesterday?

7 A. Yes.

8 138 Q. And he has told the Tribunal that he subsequently  
9 decided that he wasn't going to do that. Are you aware  
10 that the file was taken out at any time thereafter to 12:14  
11 follow up on the matter or tidy it up, or anything, or  
12 was there an automatic update system in the assistant  
13 commissioner's office in relation to files or  
14 outstanding tasks?

15 A. In relation to a system in the commissioner's office, I 12:14  
16 mean, ongoing files would be kept out. Again, this was  
17 Assistant Commissioner Kenny's file, not my file, and  
18 Assistant Commissioner Kenny was obviously making the  
19 decision in terms of seeking legal advice. He did not  
20 come back to me at any stage and request for me to take 12:15  
21 out the file or to subsequently seek a report or inform  
22 anybody else of any kind of action on that. I had no  
23 further actions with that file from July 2014 until  
24 February 2017, whenever this matter was brought back up  
25 in the media and in the 'Prime Time' programme. 12:15

26 139 Q. Okay. Is there any system in the office that requires  
27 you to update files on a regular basis?

28 A. We would have ongoing files that would be kept out and  
29 would be kept on, say, a correspondence register, where

1 we would have reminders generated, and stuff like that,  
2 but in terms of personal files that would be of  
3 confidential matters that only the assistant  
4 commissioner would deal with, that would be a matter  
5 for him to come back and request same of me. 12:15

6 140 Q. Okay. Thank you very much.

7 A. No problem, Chairman.

8  
9 **INSPECTOR DUFFY WAS QUESTIONED BY THE COURT:**

10  
11 141 Q. **CHAIRMAN:** Just after all that, there was just one  
12 matter that was on my mind, Inspector. The later  
13 correspondence came through you and the later  
14 correspondence seemed to indicate, look, the HSE have  
15 got it wrong. Was there ever any sense of a bell 12:16  
16 ringing in your mind to say, oh, this thing about  
17 digital abuse, that's completely incorrect, it's  
18 something entirely different, or was it a case where  
19 you were simply bringing matters to the attention of  
20 the assistant commissioner, effectively relying on his 12:16  
21 mind to direct you as opposed to inquiring yourself as  
22 to what was going on?

23 A. Well, I was a sergeant in the assistant commissioner's  
24 office at the time. I brought the correspondence,  
25 which I think you're referring to is dated 3rd July, 12:16  
26 from Chief Superintendent Sheridan to the assistant  
27 commissioner, and he noted same and sent it back to the  
28 chief in Cavan-Monaghan and said, I'll be having a  
29 meeting in relation to this in Mullingar. So again, it

1 was something for the assistant commissioner to deal  
2 with.

3 142 Q. **CHAIRMAN:** But did the bell ring in your mind or the  
4 penny drop, or whatever expression one might use, to  
5 say they've got this wrong? Because it was a pretty 12:17  
6 astonishing thing to happen, really?

7 A. It's terrible.

8 143 Q. **CHAIRMAN:** Yes. Agreeing that it is terrible, but it  
9 is a pretty stark -- there's a pretty stark difference  
10 between the two accounts? 12:17

11 A. There is. And again, too, I was a sergeant. I was not  
12 going to overstep my mark with the assistant  
13 commissioner. I mean, he was dealing with this file.  
14 It was the assistant commissioner's file, for a better  
15 word. I wouldn't have had a huge amount of knowledge 12:17  
16 in relation to the 2006, the 2007 file, or the  
17 allegations that Ms. D had made, and I was of the view  
18 that it was very much in the hands of Assistant  
19 Commissioner Kenny.

20 144 Q. **CHAIRMAN:** And the fact that there was this meeting in 12:17  
21 July then, that reinforced that in your mind?

22 A. That's correct, Chairman.

23 145 Q. **CHAIRMAN:** Whatever step is to be taken, he will tell  
24 me what to do?

25 A. Absolutely, Chairman. 12:18

26 146 Q. **CHAIRMAN:** Okay. I understand. Thank you.  
27 **MR. O'HIGGINS:** Chairman, may I, just arising out of  
28 your --  
29 **CHAIRMAN:** Yes, please do.

1 MR. O'HIGGINS: Obliged.

2

3 INSPECTOR DUFFY WAS FURTHER CROSS-EXAMINED BY

4 MR. O'HIGGINS:

5

12:18

6 147 Q. MR. O'HIGGINS: Just one matter which perhaps is  
7 connected with the Chairman's inquiry. You mentioned  
8 that Assistant Commissioner Kenny indicated, we'll deal  
9 with matters in the July meeting. At the July meeting,  
10 can you assist the Tribunal, what was the mood or  
11 thrust of the meeting in terms of the decision as to  
12 whether or not to close down or re-open the Garda side  
13 of things in relation to Maurice McCabe?

12:18

14 A. Well, as I have said, my role at the meeting in  
15 Mullingar in July '14 was really to record notes, and  
16 as you will see from my notes, the matter was certainly  
17 closed down or done and dusted.

12:18

18 MR. O'HIGGINS: Thank you.

19 CHAIRMAN: Yes, thank you very much.

20 A. Thank you, Chairman.

12:18

21

22 THE WITNESS THEN WITHDREW.

23

24 MR. MARRINAN: The next witness, sir, is Mr. Dermot  
25 Monaghan, please. This is in volume 10 at page 2886.

12:19

26

27 MR. DERMOT MONAGHAN, HAVING BEEN SWORN, WAS DIRECTLY  
28 EXAMINED BY MR. MARRINAN:

29 148 Q. MR. MARRINAN: Mr. Monaghan, I think that you're

1 currently head of service in primary care for the  
2 Cavan-Monaghan, Sligo-Leitrim, Donegal region, is that  
3 right?

4 A. That's correct.

5 149 Q. Between February 2011 and November 2016 you held the 12:19  
6 position of the integrated service manager for the  
7 Louth-Meath area, is that right?

8 A. That's correct.

9 150 Q. And what were your responsibilities in that regard?  
10 A. Managing all the services from hospital right across to 12:20  
11 the community services, so consultants right through to  
12 public health nurses. Anything that looked like a  
13 health service, that was my responsibility.

14 151 Q. Now, I think on the 14th May, you became aware that  
15 Ms. Fiona Ward wrote to Ms. Rosalie Smyth-Lynch, who 12:20  
16 gave evidence this morning, via an email that was  
17 copied to you, is that right?

18 A. That's correct.

19 152 Q. And that outlined a report of a data breach that had  
20 occurred in the service, is that right? 12:20

21 A. That's correct.

22 153 Q. I think that you were unaware of any of the parties  
23 referred to in the data breach because it had been  
24 anonymised, isn't that so?

25 A. That's correct. 12:20

26 154 Q. And I think you never became aware of any of the names  
27 or the identities of any of the persons in this matter,  
28 is that right?

29 A. That's correct.

1 155 Q. Now, I think subsequently on the 15th May 2014, you  
2 requested Patricia Bannon, who is a business manager in  
3 your office, to review the process that was then taking  
4 place, is that right?

5 A. That's correct. 12:21

6 156 Q. And I think if we could have page 864 on the screen,  
7 please. She replied to you there by way of email, and  
8 you will see in the centre there, and she answered:  
9

10 *"Yes. The process is correct. However, it would be 12:21*  
11 *good practice for Fiona to review their SOPs..."*  
12

13 What is an SOP?

14 A. Standard operational procedure.

15 157 Q. *"... and ensure that their systems for robust" -- "are 12:21*  
16 *robust" I suppose that should read -- "to mitigate*  
17 *against an incident like this happening again."*  
18

19 And then she signs that off as Patricia Bannon, who is  
20 the business manager and area manager in the area 12:22  
21 manager office in Louth and Meath, is that right?

22 A. That's correct.

23 158 Q. I think you approved of that. And then above that, on  
24 the same page at 864, Natasha Smith sent, on your  
25 behalf, an email to Fiona Ward, is that right? 12:22

26 A. That's correct.

27 159 Q. And it reads:  
28

29 *"Fiona, please see below comments from Patricia Bannon*





1 A. Yes.

2 164 Q. And I think you took up employment as a social care  
3 manager in a high support unit in Castleblayney from  
4 2002 to 2013?

5 A. Correct, yes. 12:23

6 165 Q. And where did you go then in 2013?

7 A. At the end of 2013 I became the manager of the Child  
8 Wellbeing Centre in Castleblayney, which was a  
9 developing centre of social care staff, and the purpose  
10 of the centre was to provide services directly to 12:24  
11 children and families in Cavan-Monaghan, from a social  
12 care perspective.

13 166 Q. And that is obviously part of the HSE Dublin Northeast?

14 A. Yeah, Tusla, Dublin Northeast.

15 167 Q. Tusla. And where were you working from at that point 12:24  
16 in time? Were you based entirely in Castleblayney?

17 A. Yes.

18 168 Q. And I believe in March of 2015, Mr. Lowry, who was the  
19 area manager, directed you to provide assistance in the  
20 Cavan social work services office in Cavan, is that 12:24  
21 right?

22 A. Both Cavan and Monaghan.

23 169 Q. Both Cavan and Monaghan?

24 A. Yeah.

25 170 Q. Could you just explain, you were working in your area, 12:24  
26 and was it normal for you to be asked to provide such  
27 services?

28 A. Well, no -- well, I suppose, to an extent it would be.  
29 The Child Wellbeing Centre covers both Cavan and

1 Monaghan.

2 171 Q. Yes.

3 A. So the staff that are based in Castleblayney work in  
4 both counties.

5 172 Q. Yes. 12:25

6 A. At that stage there was concern in relation to the  
7 backlog of unallocated cases and, from its inception,  
8 the wellbeing centre had provided an alternative  
9 through family support and direct work with young  
10 people, to the initial assessment or no further action 12:25  
11 options --

12 173 Q. Yes.

13 A. -- for the social work service. So I suppose  
14 Mr. Lowry's thinking was that, with the backlog of  
15 cases, that the wellbeing centre may be able to provide 12:25  
16 a more proportionate response to children and families  
17 who were on the waiting list at that time.

18 174 Q. Yes.

19 A. So it was for me to divert cases from that waiting  
20 list. 12:26

21 175 Q. So your management skills and interaction with managing  
22 the child wellbeing centre, you would be able to choose  
23 cases from the unallocated list that might be that  
24 urgent --

25 A. That were appropriate, yes. 12:26

26 176 Q. And therefore reduce the number?

27 A. Yes.

28 177 Q. And provide an appropriate place of referral?

29 A. Yes.

1 178 Q. If appropriate --  
2 A. Yes.  
3 179 Q. -- at that point in time?  
4 A. That's correct.  
5 180 Q. I think you were asked by him in March 2015 to provide 12:26  
6 assistance to Seamus Deeney and Kay McLoughlin, who was  
7 principal social worker and team leader, in reviewing  
8 the backlog of unallocated cases?  
9 A. Yes.  
10 181 Q. Was that a written direction or would that be normal, 12:26  
11 or would he just ask you to do it?  
12 A. Maybe, it was a verbal direction. I don't remember  
13 anything in writing.  
14 182 Q. Okay.  
15 A. Yeah. 12:26  
16 183 Q. And can you just assist the Tribunal, at that point in  
17 time what was your knowledge of Mr. Deeney and  
18 Ms. McLoughlin; were you familiar with them?  
19 A. Yes.  
20 184 Q. And your service, were you familiar with intake 12:27  
21 records?  
22 A. Yes.  
23 185 Q. And were you familiar with the process of referral and  
24 allocation of cases?  
25 A. Yes. Yeah, in the overall sense, yes. 12:27  
26 186 Q. Okay. The statement you provided to the Tribunal  
27 refers to backlog days?  
28 A. Yes.  
29 187 Q. When did you, in fact, become involved in assessing the

1 backlog, reviewing the files, etcetera?

2 A. Probably around March time. I think the first days  
3 were in March in both counties, I think, if I remember  
4 correctly.

5 188 Q. And were you working together collaboratively to review 12:27  
6 them or did you each choose a tranche of cases to take  
7 from the filing cabinet?

8 A. Well, I wouldn't necessarily have been involved in  
9 choosing any of the cases or the files. I would  
10 present myself on the day and review those that were in 12:28  
11 front of me.

12 189 Q. All right. And were you given any instructions or were  
13 you just asked -- expected to use your own judgement as  
14 to what might be done or what bundle they might be then  
15 put into? 12:28

16 A. I suppose from my own knowledge of my own service and  
17 what we were capable of, it was more or less, I  
18 suppose, you know, if I saw something that I thought  
19 that we could work with successfully, I would have  
20 informed either Kay McLoughlin or Seamus Deeney and 12:28  
21 then would have taken the referral directly from that  
22 file to one of our services.

23 190 Q. Yes. And from the files that you were reviewing, were  
24 you being asked to review the files simply and only  
25 from your own point of view? 12:28

26 A. Yes.

27 191 Q. And were there any -- was there any discussion at any  
28 stage as to criteria by which files would then be  
29 allocated or taken?

1 A. By our service?

2 192 Q. Yes.

3 A. That would -- I would have discussed that then with  
4 either Kay McLoughlin or Seamus Deeney, to ascertain if  
5 they agreed that it was appropriate for a family 12:29  
6 support response or an individual work response.

7 193 Q. Okay. Well, does that involve then you having reviewed  
8 files, assessed whether you thought you could deal with  
9 them in your service and then engaging in a discussion  
10 with Mr. Deeney and Ms. McLoughlin as to whether they 12:29  
11 agreed with that?

12 A. Yes.

13 194 Q. What about files then that you didn't think were  
14 appropriate to come into your service, as it were, what  
15 were you to do with those files? 12:29

16 A. Well, those were for review by Mr. Deeney or  
17 Ms. McLoughlin.

18 195 Q. But had you been given a selected bunch of files that  
19 they thought were appropriate for your service or were  
20 you just trawling through -- 12:29

21 A. Pretty much.

22 196 Q. -- a whole backlog?

23 A. I would imagine that the files that I was provided with  
24 were very much the lower end, I suppose would be the  
25 better way to describe them. 12:30

26 197 Q. Okay. You do record in your statement, you say:  
27  
28 *"where it appeared during the course of a review day*  
29 *that a number of people were required to be met with, a*

1           *date would be agreed for some weeks in the future and*  
2           *letters of appointment would then be forwarded."*

3  
4           what were you referring to when you included that in  
5           your statement? 12:30

6           A.   The other part of my involvement in both the Monaghan  
7           and Cavan office was to make myself available to take a  
8           note when either Mr. Deeney or Ms. McLoughlin were  
9           meeting clients that required to be met through the  
10          course of their reviewing of the files, and those days 12:30  
11          would be arranged, as I said, for a few weeks in  
12          advance, letters would be written from the social work  
13          office by Mr. Deeney or Ms. McLoughlin and I would be  
14          available on an agreed date to take the notes.

15   198   Q.   Yes.   But would these meetings and the letters be 12:31  
16          written in relation to persons against whom a complaint  
17          had been made or in relation to whom an intake record  
18          had been created?

19          A.   I would imagine so, yes.

20   199   Q.   Okay.   Can you say how many backlog days or review days 12:31  
21          there were between March and May?

22          A.   Possibly one in each county between March and May I  
23          would imagine.

24   200   Q.   Okay.   So one in each month, in each county?

25          A.   I'm not a hundred percent sure, I can check and get 12:31  
26          back to you on that, I don't know exactly.

27   201   Q.   Is there any record of the number of files that were  
28          reviewed as part of this collaborative process?

29          A.   I honestly don't know.   I would imagine Mr. Deeney or

1 Ms. McLoughlin would have some record, but I wouldn't  
2 have needed to keep a record in relation to that.

3 202 Q. All right. Did you do this in the duty room in Cavan  
4 when you came down to Cavan to do it or where did you  
5 do this? 12:32

6 A. It's referred to the training room. It's a large --

7 203 Q. The training room?

8 A. A large room, yes.

9 204 Q. Were Mr. Deeney and Ms. McLoughlin doing it in the same  
10 room? 12:32

11 A. Yes. Pretty much so, yeah.

12 205 Q. Okay. You are mentioned in an email sent by  
13 Ms. McLoughlin to Mr. Deeney and to Mr. Lowry, and I  
14 would perhaps just like you to look at that email.  
15 It's at page 1069 in the Tribunal's documents. It's an 12:32  
16 email dated 7th May 2015, it's recorded as having sent  
17 at 13:30. Just before I ask you anything about it, I  
18 think you checked your diary and you were present on  
19 the 7th May --

20 A. Yes, that's correct. 12:32

21 206 Q. -- for a file review day?

22 A. Yes.

23 207 Q. So you were in the Cavan office on this date?

24 A. Yes.

25 208 Q. Now, the email reads: 12:33  
26  
27 *"Dear Terry and Seamus*  
28 *I, along with Gayle, have been reviewing files on the*  
29 *MTP today. One relates to Maurice McCabe and I would*

1           *like to discuss this case with you both before taking*  
2           *any action as it appears that this concern was referred*  
3           *to us in 2007 and Mr. McCabe was never met. It has*  
4           *come back in again due to media coverage of Mr. McCabe.*  
5           *The outstanding actions are that Mr. McCabe be written* 12:33  
6           *to outlining the allegations and then be met and*  
7           *afforded an opportunity to respond. We would have to*  
8           *advise him that we would need to tell his wife about*  
9           *this information so she can be protective. Is it*  
10          *likely she is aware of the allegations as a file was* 12:33  
11          *sent to the DPP. However, no prosecution was directed.*  
12          *Mr. McCabe has female children and the victim was a*  
13          *seven-year-old child when the alleged incident*  
14          *occurred. My issues are that we are proposing to tell*  
15          *this woman that we have concerns about not doing it for* 12:33  
16          *possibly up to eight years and also I am not confident*  
17          *about sending the Barr letter to an address that may be*  
18          *out of date. I attach my draft Barr letter to*  
19          *Mr. McCabe."*

20  
21           Then that is signed by Ms. McLoughlin or sent by her  
22           with the draft.

23           **CHAIRMAN:** Mr. McGuinness, what is the date of that  
24           draft? I know it's the summer time, isn't it?

25           **MR. MCGUINNESS:** It's undated, the draft. 12:34

26           **CHAIRMAN:** Yes, we heard from somebody else as to what  
27           proximate date it was. I thought it was around July,  
28           I'm not sure.

29           **MR. MCGUINNESS:** This is 7th May --





1 letter yourself --

2 A. Yes.

3 216 Q. -- or composing it?

4 A. That's correct, yes. Or choosing who it was written

5 to. 12:35

6 217 Q. I am wondering did you see the draft Barr letter that

7 Ms. McLoughlin had provided on that day?

8 A. No. Not to my knowledge, no.

9 218 Q. Did she discuss it with you in any way?

10 A. No. 12:35

11 219 Q. Did you hear her mention Mr. McCabe or Sergeant McCabe

12 or Maurice McCabe on the day or around the day?

13 A. My memory in relation to those days was the concern in

14 relation to the time lapse in many areas where files

15 had been created and people hadn't been notified of 12:36

16 them. Specifically to Mr. McCabe, no, I don't remember

17 specifically.

18 220 Q. All right. Apart from any discussion with her about

19 Mr. McCabe, or Sergeant McCabe, did you hear or do you

20 recollect hearing any talk about Maurice McCabe at that 12:36

21 point in time in the office?

22 A. No. None.

23 221 Q. Do you recall any talk about her either selecting or

24 choosing or allocating a file relating to a member of

25 An Garda Síochána? 12:36

26 A. No.

27 222 Q. Or any delay in dealing with any files relating to

28 guards in particular?

29 A. No. As I said, a delay in relation to files, but not

1 specific to any member of the Garda Síochána or anyone  
2 else specifically.

3 223 Q. Yes. Mr. Lowry gave evidence to the Tribunal about  
4 having written and provided a report in relation to the  
5 service in this area in early 2014, had you been 12:37  
6 consulted about that or were you generally aware about  
7 the delays?

8 A. Mr. Lowry would have alerted me to the backlog of the  
9 unallocated cases at that point when he was asking that  
10 I offer some support to Mr. Deeney and Ms. McLoughlin. 12:37

11 224 Q. Okay. The email that is in front of you refers to the  
12 case "*has come back in again due to media coverage of*  
13 *Mr. McCabe*", were you aware yourself of media coverage  
14 in relation to Sergeant McCabe?

15 A. To some extent out with anything to do with my work I 12:37  
16 would have been aware in the media that there was --  
17 Mr. McCabe was --

18 225 Q. Were you aware from your work that there was a file in  
19 relation to Sergeant McCabe in the office when you were  
20 conducting this joint review of files on the MTP? 12:38

21 A. I can't say that it stood out or anyone specifically  
22 said to me there is a file on Maurice McCabe.

23 226 Q. So, I want to be clear, is it your evidence that you  
24 have no recollection of knowing or that you did know  
25 but you paid no heed to it? 12:38

26 A. I did know that there was -- I'm unsure actually,  
27 because I subsequently know, and I'm not sure at the  
28 time whether I connected Maurice McCabe's name with any  
29 particular file. I don't think it was in my mind at

1 that stage.

2 **MR. MCGUINNESS:** Yes. All right. Thank you,  
3 Ms. Penders. Would you answer any questions anyone  
4 else may have?

5 A. Yes. 12:38

6

7 **MS. PENDERS WAS CROSS-EXAMINED BY MR. MCGARRY**

8 227 Q. **MR. MCGARRY:** Ms. Penders, Paul McGarry is my name, I  
9 represent Sergeant McCabe.

10 A. Hello. 12:39

11 228 Q. Just looking at the email again, am I to understand it  
12 that you were providing assistance and support to  
13 Mr. Deeney and Ms. McLoughlin in relation to the MTP  
14 files?

15 A. Yes. 12:39

16 229 Q. If you look at the text of the email, it seems pretty  
17 clear that you were working with them on this  
18 particular file?

19 A. No. That's not the case at all.

20 230 Q. It says, "*I, along with Gayle --*" 12:39

21 A. Yes, "*-- have been reviewing files*".

22 231 Q. That is Kay and you --

23 A. Yes.

24 232 Q. -- have been reviewing the files on the MTP?

25 A. Yes. 12:39

26 233 Q. Then she says one, that's one of those files, I'm  
27 suggesting to you that suggests that you and she, one  
28 of the files that you and she have been working on  
29 relates to Maurice McCabe?

1 A. That's not correct, no. We wouldn't necessarily have  
2 been working on files together.

3 234 Q. Okay.

4 A. I was present for file review day on that date.

5 235 Q. I see. So it wasn't a collaborative effort then; you 12:40  
6 sat in the room and she looked at certain files and you  
7 looked at other files --

8 A. Yeah.

9 236 Q. -- and there was no discussion between you as to what  
10 was to happen to them? 12:40

11 A. Where I would have ascertained that a file would be  
12 appropriate for referral to our service, I obviously  
13 would have discussed that with Ms. McLoughlin on that  
14 occasion. She did not discuss with me.

15 237 Q. So you were the one -- when you had a file that there 12:40  
16 was an issue, you would talk to her about it but she  
17 didn't talk to you about it?

18 A. I suppose the files were primarily hers and I was  
19 requesting to divert them. So she was my superior in  
20 that relationship, so I would have been asking was she 12:40  
21 agreeing with me in that respect.

22 238 Q. Why then, if you had no involvement or role in relation  
23 to this file, do you think you were copied on the email  
24 from Sergeant McCabe's solicitors in January 2016?

25 A. My recollection of that is that on the date that we 12:40  
26 were due to meet various clients, normally what would  
27 happen on those occasions would be that the letter  
28 would come from Ms. McLoughlin, a lot of the time  
29 clients that she wrote to would contact her before the

1 date either to agree that they would attend or to ask  
2 for more information, or whatever it happened to be, on  
3 the morning of those days, Ms. McLoughlin would then  
4 tell me that we had appointments at 10:00, 12:00 and  
5 2:00, or whatever it happened to be. I have no 12:41  
6 recollection of this, but I imagine that when  
7 Mr. McCabe did not turn up, purely and simply that for  
8 my information Ms. McLoughlin forwarded me the email.  
9 I would have been present to take the meeting on that  
10 day. 12:41

11 239 Q. It wasn't that he didn't turn up, it was the fact that  
12 his solicitor had said he wasn't going to turn up.

13 A. Yes.

14 240 Q. So, why would you have had any role in relation to that  
15 at all if you had nothing to do with it previously? 12:41

16 A. I was purely present there to take the minute had  
17 Mr. McCabe turned up.

18 241 Q. Thanks.

19

20 **MR. O'HIGGINS:** No, questions Chairman. 12:42

21 **CHAIRMAN:** Great.

22 **MR. MCGUINNESS:** Thank you.

23 **CHAIRMAN:** Good. That's it. What progress with we  
24 making now, Mr. McGuinness? I mean, where are we in  
25 terms of the schedule? 12:42

26

27 **THE THEN WITNESS WITHDREW**

28

29 **MR. MCGUINNESS:** Today, Judge, we have two remaining

1 witnesses; Ms. Bannon who will be quite short and  
2 Mr. Quinlan who will be relatively short.

3 **CHAIRMAN:** Yes. Do we want to take a break? Everybody  
4 is tired. I'm sorry, I'm confessing to being tired, so  
5 could we say 2:15?

12:42

6  
7 **THE HEARING THEN ADJOURNED FOR LUNCH**





1 functions and services, HR medical, Freedom of  
2 Information requests and parliamentary questions,  
3 complaints and special projects, is that correct?  
4 A. That's correct.  
5 246 Q. Now I think as part of that role within the HSE, the 14:28  
6 area manager, who at that time -- who at the relevant  
7 time was Mr. Monaghan would seek advice on particular  
8 issues, is that correct?  
9 A. That's correct.  
10 247 Q. And he has told us this morning that he sent an email 14:28  
11 to you on 15th May 2014 looking for your advice in  
12 respect of a particular issue that had arisen, is that  
13 correct?  
14 A. That is correct.  
15 248 Q. Now, I think you had no particular memory of receiving 14:28  
16 that email until the Tribunal asked you about it, is  
17 that correct?  
18 A. That's correct, also, yes.  
19 249 Q. Yes. Now, that email is to be seen at page 320 of the 14:29  
20 materials, and it should come up in front of you. Is  
21 it on the screen?  
22 A. It is, thank you.  
23 250 Q. Yes. So, Ms. Natasha Smith sent you an email and that  
24 was on Mr. Monaghan's behalf, is that correct?  
25 A. That's correct. 14:29  
26 251 Q. And that was on 15th of May 2014, and it simply said  
27 "*Patricia, is this a correct process?*" - is that  
28 correct?  
29 A. That's correct.

1 252 Q. And attached to that email was the report which had  
2 been completed by Fiona Ward in respect of an incorrect  
3 report which had been forwarded from Rian Counselling  
4 to the HSE, is that correct?  
5 A. That's correct, yes. 14:29

6 253 Q. And at the second -- that report was two pages, and  
7 it's to be seen at pages 308 and 309 of the materials,  
8 and it set out the steps that she proposed taking in  
9 relation to the incorrect report that had been  
10 completed by her, one of her counsellors and sent to 14:30  
11 the HSE, is that correct?  
12 A. That's correct, yeah.

13 254 Q. And you were asked were the steps as outlined in that  
14 report correct, is that correct?  
15 A. That is correct. That is what Dermot wanted to know, 14:30  
16 yeah.

17 255 Q. Yes. And is that a routine inquiry that might be  
18 addressed to you?  
19 A. Yes, that would come under my remit.

20 256 Q. Okay. And essentially, Ms. Ward had said that the 14:30  
21 counsellor had apologised to the client and told her  
22 that the information in the report would be corrected  
23 immediately and the social work service and the Gardaí  
24 would be informed of the inaccuracy, isn't that right,  
25 and issued with a correct report? 14:30  
26 A. Yes.

27 257 Q. And then a letter would be sent to the client, Ms. D,  
28 apologising for the inaccuracy, outlining the steps  
29 taken to correct the error and enclosing a corrected

1 version of the report, and then the counsellor  
2 therapist phoned the social work service and informed  
3 them verbally of the error?

4 A. Yes.

5 258 Q. And then a corrected version of the report was provided 14:31  
6 to the social work service as soon as the error came to  
7 light on 15th of May 2014, and social work had been  
8 asked to retrieve and shred the previous inaccurate  
9 report and place the accurate report on the client  
10 file. Then it continued on: 14:31  
11

12 *"A letter was drafted and sent to the Gardaí informing  
13 them that the report they hold contains an inaccuracy  
14 and asking that they return this report to the service  
15 so that it can be destroyed and a copy of the corrected 14:31  
16 report will be provided to the Gardaí."*

17 A. Yes.

18 259 Q. Now, did you understand at that stage that the Gardaí  
19 hadn't been provided with the counsellor's report, it  
20 was a standard HSE report that had been provided to the 14:31  
21 Gardaí?

22 A. My understanding and my interest in the report was that  
23 each of the steps had been taken appropriately from my  
24 understanding and my knowledge.

25 260 Q. Yes. 14:31

26 A. The details of exactly what had happened weren't really  
27 for my remit, it was just that the process had been  
28 followed correctly.

29 261 Q. Okay. So you didn't take it from that, that there

1 were, at that time, two incorrect reports in  
2 circulation?

3 A. No. My input into it would be that there was -- okay,  
4 there was an incorrect report, this action had been  
5 corrected by providing the Gardaí, or like we would 14:32  
6 with any other organisation, with the correct report  
7 and that the error had been --

8 262 Q. Rectified?

9 A. -- rectified.

10 263 Q. Okay. And then: 14:32  
11

12 *"NCS, the National Counselling Service, in the*  
13 *southeast were informed that the report they hold on*  
14 *file is inaccurate. They were asked to remove the*  
15 *report from the file and shred it and a copy of the 14:32*  
16 *correct report was to be furnished to the NSE in the*  
17 *southeast."*

18 A. And again, that would be a correct step; to inform the  
19 National Counselling Service that they had an  
20 inaccurate report and that the correct report was then 14:32  
21 given to them.

22 264 Q. And then you replied a short time afterwards to  
23 Mr. Monaghan, you said:

24

25 *"Yes, the process is correct. However, it would be 14:33*  
26 *good practice for Fiona to review their SOPs and ensure*  
27 *that their systems for robust to mitigate against an*  
28 *incident like this happening again."*  
29

1 Is that correct?

2 A. That is a slight typo. It should have said are robust.  
3 But yes, there are Standard Operating Procedures, they  
4 should review them in order to mitigate against an  
5 incident like this happening again, which would, again, 14:33  
6 be standard practice; if there is a mistake noted that  
7 you should be changing how you do things to ensure that  
8 the mistake doesn't happen again.

9 265 Q. Okay. And insofar as their procedures have changed  
10 since then, the Tribunal understands that now the 14:33  
11 client and the counsellor together look over a copy of  
12 any report, is that in your view --

13 A. Appropriate.

14 266 Q. -- appropriate, at this time? And in relation to the  
15 report that you got, I think there were no names of any 14:34  
16 people on it, is that correct?

17 A. No, there wasn't. It was anonymised. That is all that  
18 I have seen; what is there.

19 267 Q. It was simply Ms. Ward's name, so you knew who the --

20 A. I knew it belonged to Rian Counselling but that was as 14:34  
21 much as I'd know.

22 268 Q. Okay. There is also a reference to Cavan in it. Do  
23 you remember that?

24 A. No. I was really looking at the steps that Ms. Ward  
25 had taken following, you know, her awareness that the 14:34  
26 report had been circulated.

27 269 Q. Okay. And it may be a superfluous question but do you  
28 remember discussing the matter with anybody or anything  
29 of that nature?

1 A. No, I hadn't, and I didn't even have a verbal  
2 conversation with Dermot because I responded via email  
3 to him.  
4 **MS. LEADER:** Thank you very much. If you would answer  
5 any questions anybody else might have for you. 14:35  
6 **MR. MCGARRY:** I don't have any questions, thank you.  
7 **MR. DONAL MCGUINNESS:** No questions, Chairman.  
8  
9 **THE WITNESS THEN WITHDREW**  
10 14:35  
11 **MS. LEADER:** The next witness, sir, is Mr. Cormac  
12 Quinlan.  
13  
14 **MR. CORMAC QUINLAN, HAVING BEEN SWORN, WAS DIRECTLY**  
15 **EXAMINED BY MS. LEADER AS FOLLOWS:** 14:35  
16  
17 **MS. LEADER:** Mr. Quinlan's statement, sir, is in the  
18 second of the volume 9s at page 2665, and there are two  
19 documents attached to his statement - one is the  
20 Children's First guidelines, which is at page 2678, and 14:36  
21 there is a second document attached, which is Policy  
22 and Procedures for Responding to Allegations of Child  
23 Abuse and Neglect, and that is at page 2786 of the  
24 materials.  
25 270 Q. Now, Mr. Quinlan, I understand that you are the interim 14:36  
26 Director of Policy and Strategy with the Child and  
27 Family Agency, is that correct?  
28 A. That's correct.  
29 271 Q. And if you would just outline what that job involves,

1 please, for the Tribunal?

2 A. The director of policy is responsible for the  
3 development of operational policy within the  
4 organisation based on national policy or guidance as  
5 issued, I suppose, through the Department or by 14:36  
6 legislation. We also provide specialist advice to the  
7 chief executive office in the SOP in relation to any  
8 specific policy areas, and we are also involved in  
9 strategic development programmes within the  
10 organisation and to reflect the kind of strategic 14:37  
11 objectives that the organisation has going forward in  
12 terms of changes to the service.

13 272 Q. And I think in relation to your qualifications for that  
14 particular job, you have been a practising social  
15 worker and manager in child protection and welfare 14:37  
16 since 1997, you tutored with the Master's Social Work  
17 Programme in Trinity College Dublin and you are a  
18 member of the Social Work Registration Board in  
19 Ireland, is that correct?

20 A. That's correct. 14:37

21 273 Q. Now, just very generally with regard to policies and  
22 procedures, I think these are tools used by the Child  
23 and Family Agency so they can achieve the work they are  
24 supposed to do, is that correct?

25 A. That's correct. They provide, yes, guidance to staff 14:37  
26 in relation to the performance of their functions.

27 274 Q. Okay. So the staff typically would refer to these  
28 documents in order that they can carry out their jobs  
29 that they are assigned to do, is that correct?

1 A. That's correct.

2 275 Q. Now, just very generally, I understand that the Child  
3 and Family Agency has a statutory responsibility for  
4 the welfare of children, is that correct?

5 A. That's correct. 14:38

6 276 Q. And prior to the Child and Family Agency having that  
7 statutory responsibility, it was the responsibility of  
8 the Health Service Executive?

9 A. That's correct.

10 277 Q. And if you could just very briefly explain to the 14:38  
11 Tribunal when the change-over of roles occurred and,  
12 you know, the specific responsibility of Tusla with  
13 regard to that?

14 A. So the Child and Family Agency was established in 2014  
15 following a specific piece of legislation known as 14:38  
16 Child and Family Agency Act. Prior to that, as you had  
17 outlined I suppose, the child protection services was  
18 provided as part of the HSE. However, kind of, within  
19 that context I suppose children and family services  
20 within the HSE had begun to establish themselves under 14:38  
21 separate directorate, I suppose, particularly in 2010  
22 when there was an assistant director for children and  
23 family services appointed at the beginning of 2010 and  
24 then at the end of 2010 a national director was  
25 appointed for children and family services. So there 14:39  
26 had been kind of established governance structures  
27 within the HSE at that point in relation to the  
28 coordination of children and family services. But that  
29 entire function then transferred over to the Child and



1 Family Agency in 2014 when the agency was established.  
2 278 Q. Okay. And I think in relation to your statutory  
3 responsibilities, section 3 of the Child Care Act says:

4  
5 *"It shall be the function of every health board --"* 14:39

6  
7 which is now Tusla's function.

8  
9 *"-- to protect the welfare of children in its area."*

10 14:39

11 Is that correct?

12 A. That's correct.

13 279 Q. And the Child and Family Agency Act, section 8, which  
14 is a 2013 Act, provides that:

15 14:39

16 *"You shall support and promote the development, welfare  
17 and protection of children, support and encourage the  
18 effective functioning of families, and provide for the  
19 protection of care of children in circumstances where  
20 their parents have not given or are unlikely to be able  
21 to give adequate protection and care."* 14:39

22  
23 Is that correct?

24 A. That's correct.

25 280 Q. Now, I think the Child and Family Agency Act gives you 14:40  
26 particular statutory powers in order to execute those  
27 duties, but they mostly relate to identifiable children  
28 which the agency has identified as being at risk, is  
29 that correct?

1 A. Our responsibilities are, I suppose, twofold in  
2 relation to identified children who might be at risk,  
3 but also we have a promoting function as well in  
4 relation to identifying children that might be possibly  
5 at risk as well. 14:40

6 281 Q. Yes. And going along with those statutory functions,  
7 you also have functions identified by various case law  
8 in relation to unidentified children who may be at  
9 risk, is that correct?

10 A. That's right. Additional case law I suppose over time 14:40  
11 has clarified and further, I suppose, identified our  
12 promotional responsibilities to those unidentified  
13 children.

14 282 Q. Okay. And I think those cases, which we refer to here  
15 as the Barr judgment, is a case called Gleeson, is 14:40  
16 it --

17 A. That's correct.

18 283 Q. -- and it dates from the 1990s?

19 A. That's correct.

20 284 Q. And essentially, the ratio of that decision says if you 14:40  
21 are aware that there is an adult who may be a risk to  
22 children it's your job to assess who those children are  
23 and also assess the risk in relation to that particular  
24 adult, is that a fair summary of what it says?

25 A. Yes. I suppose, our responsibility is to seek to try 14:41  
26 and identify children who might be possibly at risk and  
27 in doing so then our responsibility is to share  
28 relevant information with relevant persons so that  
29 those individuals can make protective action in

1 relation to those children.

2 285 Q. Yes. And I think there have been a series of cases  
3 since then, one in 2010 and -- both in 2010, which  
4 emphasised that particular role of the Child and Family  
5 Agency now, but it was the HSE then, is that correct? 14:41

6 A. That's correct.

7 286 Q. Those decisions are MI, I think, in 2010, and P versus  
8 a particular secondary school, is that correct?

9 A. That's correct.

10 287 Q. Now, in order to carry out those functions, I want to 14:41  
11 refer you to two particular documents that I  
12 understand, and the Tribunal understands, help the  
13 social workers in order to carry out their functions.  
14 And the first is the Children First Guidelines, and I  
15 think they date from 2011, but they replace earlier 14:42  
16 Children First Guidelines which date from 2009, is that  
17 correct?

18 A. The previous Children First is 1999.

19 288 Q. 1999, I beg your pardon.

20 A. Yes. 14:42

21 289 Q. And these are 2011?

22 A. That's correct.

23 290 Q. Now, the document is contained in full in the  
24 Tribunal's documentation, and I don't intend to go  
25 through all of that particular document, but there are 14:42  
26 a few areas I wish to particularly point out to you.  
27 First of all, the Children First Guidelines isn't  
28 addressed just to the Child and Family Agency, but to  
29 all agencies and people who may work with children, is

1           that correct?

2           A.    Yes.  Children First, I suppose, creates an obligation  
3           on all persons -- professional, moral, ethical  
4           obligation on persons in relation to their protection  
5           of children in Ireland, yes. 14:43

6  291   Q.    Now, if we could turn to page 2704, and it's at  
7           paragraph 3.6 of the Children's First Guidelines, it  
8           deals particularly with retrospective disclosure by  
9           adults, isn't that correct?  It will come up on the  
10          screen in front of you. 14:43

11          A.    That's correct.

12  292   Q.    And this is what is of particular interest to this  
13          Tribunal, so it outlines at paragraph 3.6.1:  
14  
15          *"An increasing number of adults are disclosing abuse* 14:43  
16          *that took place during their childhood.  Such*  
17          *disclosures often come to light when adults attend*  
18          *counselling.  It is --"*

19  
20          This is in bold. 14:43

21  
22          *"It is essential to establish whether there is any*  
23          *current risk to any child who may be in contact with*  
24          *the alleged abuser revealed in such disclosures."*

25 14:43

26          So, this would be familiar to any counsellor, is that  
27          correct?

28          A.    Yes, that's correct.

29  293   Q.    It should be, at any rate?

1 A. It should be.

2 294 Q. And it puts a particular onus on any particular  
3 counsellor to make further inquiries with regard to any  
4 disclosure of retrospective abuse, is that fair to say?

5 A. Well, it creates an obligation -- it specifically here 14:44  
6 mentions a -- it creates an obligation on any person  
7 who becomes, I suppose, aware of retrospective abuse to  
8 report that.

9 295 Q. And if we could then turn to paragraph 3.9, which is  
10 headed "*Confidentiality*" and it emphasises there that 14:44  
11 just because something is told to somebody in  
12 counselling, doesn't mean that it has to be kept within  
13 a counselling environment, isn't that essentially what  
14 this section seeks to outline to people?

15 A. Yes. What it highlights here is the protection of the 14:44  
16 child, I suppose, would be paramount in that context.  
17 So, therefore, certain information could not be kept  
18 confidential if it related to a matter that concerned  
19 the protection of a child.

20 296 Q. And it outlines at paragraph 3.9.4: 14:45  
21  
22 *"The provision of information to the statutory agencies*  
23 *for the protection of a child is not a breach of*  
24 *confidentiality or data protection."*

25 A. That's correct. 14:45

26 297 Q. So that deals with that particular section. Now, in  
27 relation to other agencies at paragraph 4.5 of the  
28 Children's First guidelines, it sets out the roles and  
29 responsibilities of An Garda Síochána, and it says

1           there:

2

3

4

5

6

7

8

9

10

11

12

A. That's correct.

13

298

Q. That's correct. And I suppose, in that paragraph, what it outlines is the particular role of the Gardaí in relation to investigating suspected crimes, is that correct?

15

16

17

A. That's correct.

18

299

Q. And at paragraph 4.6 of the Children's First Guidelines, which is at page 2710, it outlines cooperation between An Garda Síochána and the HSE Children and Family Services, and it again says:

20

21

22

23

24

25

26

27

28

29

*"An Garda Síochána and the HSE Children and Family Services have different functions, powers and methods of working. The specific focus of the HSE is on the assessment of the welfare of the child and the family, the specific focus of An Garda Síochána is on the investigation of alleged offences and whether a crime has been committed. Joint working between the HSE*

14:45

14:45

14:46

14:46

14:46

1 *Children and Family Services and An Garda Síochána*  
2 *forms an integral part of the child protection and*  
3 *welfare services and is described in more detail in*  
4 *chapter 7."*

14:47

5  
6 So that gives a general outline of what the two  
7 agencies are about and refers on to chapter 7 in  
8 relation to specifics, isn't --

9 A. That's correct, yes.

10 300 Q. -- that a summary of that? Now, before I come on to  
11 the part 7 of the materials, there are two sections  
12 that I wish to outline. First of all, under  
13 *"Assessment and Management of Child Protection and*  
14 *Welfare Concerns"*, which is at page 2719, what it says  
15 in relation to referral and assessment at paragraph  
16 5.2.1, is that:

14:47

14:47

17  
18 *"All child protection and welfare concerns reported to*  
19 *the HSE Child and Family Services must be acted upon*  
20 *immediately and formally recorded and followed up as*  
21 *soon as possible."*

14:47

22  
23  
24 So, as director of policy would you expect that  
25 referrals to the Child and Family Agency would spend  
26 time not being acted upon, say, for instance, here we  
27 know that a referral was made in August 2013 and didn't  
28 get acted upon until April 2014, as a director of  
29 policy, would you say that is immediately and followed

14:47

1 up as soon as possible?

2 A. Well, any report that is received by the agency is  
3 prioritised for response, immediate child protection  
4 concerns are always responded to immediately --

5 301 Q. Yes. 14:48

6 A. -- in that context. I think the agency, I suppose, has  
7 been on record, I suppose, in relation to some  
8 challenges it faces in relation to cases awaiting  
9 allocation. So there is a situation whereby we  
10 obviously try and respond to the most urgent cases in 14:48  
11 the most timely manner, but there are cases that do  
12 await allocation due to resource deficits within the  
13 organisation at times.

14 302 Q. And these resource deficits, are they being looked at  
15 or trying to be managed in any way? 14:48

16 A. Absolutely. Absolutely. So there has been, I suppose,  
17 back -- there has been, I suppose, a series of audits  
18 done in the organisation by quality assurance in  
19 relation to the review of cases awaiting allocation.  
20 And last year in particular there was a very specific 14:49  
21 audit done which examined every single case awaiting  
22 allocation for the purpose of clarifying the priority  
23 status of those cases and for, I suppose, assisting us  
24 on building business cases in relation to kind of  
25 additional resources to address that deficit. And 14:49  
26 there has been continual efforts, which the agency is  
27 on record of, in relation to, I suppose, reductions in  
28 cases awaiting allocation over time, but it continues  
29 to be a source of concern for us.



1 303 Q. Okay. Then at paragraph 5.2.3 it says:

2

3 *"The HSE should operate standard assessment procedures*  
4 *for reported concerns about children. These procedures*  
5 *should cover notification to the designated person* 14:49  
6 *within the HSE, notification to An Garda Síochána,*  
7 *strategy meetings, child protection conferences, child*  
8 *protection reviews and assessment of risk to the child*  
9 *and any other child in the same situation."*

10

14:50

11 And that refers specifically to the cooperation with  
12 the guards, as I understand it, is that correct?

13 A. That's correct. So the agency has what we call ou  
14 standard business processes or procedures in relation  
15 to the management of referrals received by the agency, 14:50  
16 and we also have an additional guidance document that  
17 was developed following the production of Children  
18 First in 2011, which is called our Child Protection and  
19 Welfare Handbook, which gives additional guidance to  
20 staff in relation to the management of referrals. 14:50

21 304 Q. Is that 2014 document?

22 A. No, it's a 2011 handbook.

23 305 Q. Handbook. Okay. And if I could then turn to page  
24 2730, which is part of the chapter on assessment and  
25 management of child protection and welfare concerns, 14:50  
26 and at paragraph 5.21 of that, it's stressed that:

27

28 *"Record-keeping is of critical importance in this area*  
29 *of work. Unless accurate records are maintained the*

1           *ability to adequately protect vulnerable children may*  
2           *be severely curtailed. It is essential that*  
3           *professionals keep contemporaneous records of all*  
4           *reported concerns in a safe place. These should*  
5           *include details of contacts, consultations and any* 14:51  
6           *action taken."*

7           A. That's correct. And there's further reference to the  
8           importance of record-keeping and chronologies in the  
9           child protection and welfare handbook that I mentioned  
10          earlier on. 14:51

11   306   Q. Yes.

12          A. And also there is reference to the importance of  
13          record-keeping in relation to our 2014 policy in  
14          relation to responding to allegations of abuse.

15   307   Q. Okay. So from your point of view as director of policy 14:51  
16          and strategy, do you think there is -- should be any  
17          lack of clarity within the staff of Tusla or the HSE  
18          with regard to maintaining files in a proper fashion?

19          A. No. I think all the current policy and procedures in  
20          place would clearly indicate the importance of keeping 14:51  
21          effective record-keeping on files.

22   308   Q. Okay. And that is nothing new, it's been there --

23          A. That has been there since I have been involved in the  
24          service certainly, yes.

25   309   Q. Okay. Now, I think the protocol for An Garda Síochána 14:52  
26          and HSE liaison is contained in chapter 7 of the  
27          Children's First Guidelines, and that appears at page  
28          2735 of the materials. And just if I could just  
29          highlight:

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29

*"Cases to be formally notified by the HSE to An Garda Síochána."*

That is at paragraph 7.4.1. It outlines:

14:52

*"where the HSE suspects that a child has been or is being physically or sexually abused or willfully neglected, An Garda Síochána must be formally notified in accordance with the procedure set out in paragraph 7.4.5 below. The process of establishing whether grounds exist for suspecting such abuse may involve consulting a relevant professional, personnel within the HSE and, where appropriate, in outside agencies. However, the HSE must not await confirmation of such abuse, whether from a child abuse assessment unit or otherwise, before notifying An Garda Síochána."*

14:52

14:53

And just, if I could stop there and ask you: Do you think that paragraph deals with the situation where a second Garda notification is sent by the HSE?

14:53

A. Sorry?

310 Q. If something has been notified to the Gardaí and investigated by the Gardaí, which is on file with the HSE or Tusla, would you expect a second notification to issue if you follow the guidelines?

14:53

A. In relation to the exact same incident, no. It shouldn't.

311 Q. It shouldn't. And you are very clear about that?

1 A. Yes. A notification occurs in relation to a specific  
2 incident of abuse that we have suspected and we  
3 notified in relation to that.

4 312 Q. Okay. And would you expect people to consult with old  
5 files in relation to prior notifications if something 14:53  
6 came up again?

7 A. Absolutely. Under our Standard Operating Procedures  
8 for any new referral received there is a requirement, I  
9 suppose, to examine previous records held by the agency  
10 in relation to making a determination of the next steps 14:54  
11 in relation to that matter.

12 313 Q. Okay. And I suppose that's included in, that you  
13 consult relevant professional personnel within the HSE,  
14 is that correct? The re-notification procedure, you  
15 would satisfy yourself with consulting relevant 14:54  
16 personnel who may have been involved in files in  
17 different times, is that correct?

18 A. Well --

19 314 Q. In the case of a second notification.

20 A. In relation to, I suppose, any referral, there is -- 14:54  
21 any referral process is two stages. One is a kind of  
22 determination of eligibility, and the second is what is  
23 called a preliminary inquiry. In relation to -- as  
24 part of the preliminary inquiry you would examine  
25 previous records held by the agency and you would 14:54  
26 perhaps make contact with relevant persons at that  
27 point, internal to the agency, in relation to  
28 determining the next steps of action, so you could  
29 consult -- it's called internal checks or other checks,

1 I suppose, in our Standard Operating Procedures.

2 315 Q. And that was effective in 2013?

3 A. That was effective in 2013, yes.

4 316 Q. Okay. And if I could then turn to the procedure for  
5 the HSE to notify An Garda Síochána, that is at page 14:55  
6 2736 of the materials. At paragraph 7.4.5 there is a  
7 six-step procedure laid out there in relation to  
8 notification to An Garda Síochána. And I think what it  
9 says is:

10  
11 *"The designated person within the HSE sends the*  
12 *standard notification form to the local Garda*  
13 *superintendent. Where more than one child is involved*  
14 *a separate standard notification form should be sent in*  
15 *respect of each child. A copy is retained on the file 14:55*  
16 *on each child. The social worker handling the case is*  
17 *named on the form."*

18  
19 And that sets out the Garda notification, how it  
20 happens. If I could just ask you there: what do you 14:56  
21 regard as the local Garda superintendent when a Garda  
22 notification is being given to the Guards? who is the  
23 local Garda superintendent?

24 A. It's the local station in which the incident occurred  
25 and normally -- or, in our case, it's where the child 14:56  
26 resides, normally.

27 317 Q. So it's either where the child resides, if it is a  
28 child --

29 A. Yes.

1 318 Q. -- in the case of a retrospective --  
2 A. It would be where the concern, I suppose, regarding the  
3 children who are potentially at risk would reside then  
4 as well.  
5 319 Q. Would you expect that Garda station to be known to 14:56  
6 HSE/Tusla personnel?  
7 A. Yes.  
8 320 Q. Yes. Then it sets out at number 2:  
9  
10 *"On receipt of the standard notification form, the 14:56*  
11 *Garda superintendent arranges to have a designated*  
12 *garda assigned to the case and immediately informs the*  
13 *designated person within the HSE of the garda's name*  
14 *and station."*  
15 14:57  
16 Is that the garda liaison person, you would expect that  
17 person to be?  
18 A. Sorry, could you repeat that question again?  
19 321 Q. Yes. So, on receipt of the standard notification form,  
20 it's (ii) -- 14:57  
21 A. Yes.  
22 322 Q. *"-- the Garda superintendent arranges to have a*  
23 *designated garda assigned to the case --"* Now, what I  
24 am asking you, is that designated garda -- would you  
25 expect that designated garda to be the liaison garda 14:57  
26 with the HSE?  
27 A. Well, I suppose the garda and superintendent may  
28 appoint someone who investigates that particular case,  
29 but sometimes there is a liaison garda just in relation

1 to general, I suppose, overview of all notifications  
2 between the HSE and ourselves. So it may not be the --  
3 323 Q. There is no particular significance to that?  
4 A. No. I suppose, they just assign -- my understanding is  
5 that you assign a particular member of the Gardaí to 14:57  
6 investigate that matter, as we assign a social worker  
7 to allocate, to assess that matter.  
8 324 Q. And (iii) says:  
9  
10 *"The designated garda makes direct contact without*  
11 *delay with the HSE social worker (or other designated*  
12 *person) dealing with the case in order to obtain*  
13 *details."*  
14  
15 A. That's correct. 14:58  
16 325 Q. *"(iv) when contact is established, both the designated*  
17 *garda and the social worker commence completion of the*  
18 *Record of Garda - HSE Liaison Form."*  
19  
20 Is that correct? 14:58  
21 A. That's correct.  
22 326 Q. *"At the same time, the garda superintendent will assign*  
23 *a designated inspector/sergeant to manage the*  
24 *investigation, monitor its progress and consult with*  
25 *the appointed HSE designated person of the case."* 14:58  
26 A. That's correct.  
27 327 Q. And finally in (vi):  
28  
29 *"where contact cannot be established between the*

1 *designated Garda and the social worker, the matter will*  
2 *revert immediately to the HSE Social Work Team Leader*  
3 *of the case and the designated garda inspector/sergeant*  
4 *for resolution."*

5 A. That's correct. 14:58

6 328 Q. That is essentially the protocol that is followed with  
7 regard to individual cases, is that correct?

8 A. That's correct.

9 329 Q. Now, paragraph 7.5 provides for informal consultation  
10 between the two agencies, is that correct? 14:59

11 A. That's correct.

12 330 Q. And then it says:

13  
14 *"In cases where the HSE is aware of concerns about a*  
15 *child but is unable to establish sufficient grounds for* 14:59  
16 *formal notification, the HSE should consult with An*  
17 *Garda Síochána on an informal basis. Such contact is*  
18 *to be actively encouraged in order to protect the*  
19 *welfare of the child concerned."*

20  
21 So, is that a step which falls short of formal  
22 notification? 14:59

23 A. Yes, I suppose inter-agency cooperation between the  
24 Gardaí and ourselves is encouraged to ensure that we  
25 are constantly engaging, I suppose, in relation to the 14:59  
26 sharing of information that would pertain to our  
27 respective responsibilities. So, that is in addition  
28 to the formal notification process.

29 331 Q. And it's a legitimate step to be taken by any social



1 worker or team leader prior to formal notification?  
2 A. Yes, in order to establish, as I said, there's  
3 sufficient grounds for formal notification.  
4 332 Q. So, for instance, in a case where a thing is coming  
5 into the HSE for a second time, it may be something 15:00  
6 that would be usefully employed in order to establish  
7 for definite whether the Gardaí had investigated a  
8 matter prior to that?  
9 A. Absolutely. It would be important for people to be  
10 able to contact and speak to each other to clarify 15:00  
11 information so as to prevent a particular action that  
12 shouldn't happen taking place.  
13 333 Q. Now, I think the various templates of these standard  
14 notification forms are set out, attached to the  
15 Children's First Guidelines, is that correct? 15:00  
16 A. That's correct.  
17 334 Q. And they appear in the materials. Now, there is a  
18 second document that I wish to open to you,  
19 Mr. Quinlan, and it is the Policy and Procedures for  
20 Responding to Allegations of Child Abuse and Neglect, 15:00  
21 and that is dated September 2014. And if you could  
22 just briefly explain to me how this document came  
23 about, considering there was already a Children's First  
24 Guidelines available since 2011.  
25 A. The policy, I suppose, arose fundamentally in relation 15:01  
26 to the performance or functions and in particular, I  
27 suppose, legal challenges that we faced in relation to  
28 meeting our functions, which I have outlined in my  
29 witness statement. So basically the requirement I

1 suppose on the agency is in relation to determining an  
2 outcome in relation to an allegation of abuse and to  
3 apply fair procedures in relation to the assessment and  
4 determination of that specific outcome in respect of  
5 that allegation. And this policy and procedure 15:01  
6 outlines that process to be followed in relation to the  
7 determination of an outcome which is defined in the  
8 policy as a funded or unfounded outcome in relation to  
9 a specific allegation of abuse, and, like I said, the  
10 procedures that should be followed to make sure that 15:01  
11 that is fair and just in relation to determining that  
12 outcome.

13 335 Q. Okay. And insofar as the document is dated September  
14 2014, do you think people in the staff of the HSE and  
15 Tusla would have been aware of what was contained in 15:02  
16 this document prior to September 2014? was there  
17 anything new in it?

18 A. There was specific new provisions, yes, within it, from  
19 September 2014 on, particularly in relation to, I  
20 suppose, some of the defined procedures laid out in the 15:02  
21 document, and particularly the determination of founded  
22 and unfounded, which were new categories, I suppose,  
23 that were adopted at that point. Historically, I  
24 suppose, outcomes had been previously defined, I  
25 suppose, in the original Children's First 1999 and in a 15:02  
26 supplemental document that was produced by the health  
27 boards at that stage, which outlined the outcomes to be  
28 different; they were identified as unfounded, confirmed  
29 or inconclusive. So there was a change in relation to

1 this particular policy document at that time.

2 336 Q. Okay. Now, I think the key principles governing the  
3 policy are set out at page 2793 of the materials at  
4 paragraph 3, and they set out:

5  
6 *"(A) The Child and Family Agency is required under the*  
7 *Child Care Act to promote the welfare of children who*  
8 *are not receiving adequate care and protection and in*  
9 *so doing, must regard the welfare of the child as the*  
10 *paramount consideration.*

15:03

15:03

11  
12 *(B) The Child and Family Agency has a duty to determine*  
13 *whether there may be a risk to a child and assess any*  
14 *such risk.*

15:03

15  
16 *(C) If the child is believed to be at immediate serious*  
17 *risk the child's interests take priority over*  
18 *consideration of the alleged abuser's right to be*  
19 *informed of the allegations against him or her prior to*  
20 *necessary protective action being implemented to ensure*  
21 *the safety and welfare of the child.*

15:03

22  
23 *(D) And if the Child and Family Agency comes to a*  
24 *conclusion that there is immediate serious risk to a*  
25 *child, it is under a duty to communicate this to an*  
26 *appropriate relevant third party, if that is necessary*  
27 *to, to enable them to take whatever protective action*  
28 *may be necessary.*

15:03

1 (E) Working in cooperation with parents and family and  
2 maintaining children in their own home, whenever  
3 possible, is in the best interests of children. If a  
4 child is living with an alleged abuser the safety of  
5 the child is paramount. From a child protection and 15:04  
6 welfare perspective a determination has to be made by  
7 social work professionals on the balance of  
8 probability.

9  
10 (G) The Child and Family Agency has a duty to ensure 15:04  
11 that any action taken in relation to an alleged abuser  
12 is, where possible, done in accordance with natural  
13 justice and fair procedures. In particular,  
14 individuals have a right to be informed of what is  
15 alleged against them and to be given a reasonable 15:04  
16 opportunity to put forward their submission or to make  
17 representations. This is set out further below.

18  
19 The Child and Family Agency should take into  
20 consideration in its assessment any representations an 15:04  
21 alleged abuser makes and should not reach a final  
22 conclusion without considering this."

23  
24 So they are essentially the key points which underpin  
25 this whole document, is that correct? 15:05

26 A. That's correct.

27 337 Q. And this document exists in the absence of any specific  
28 statutory powers that the agency has in order to carry  
29 out its functions, is that correct?

1 A. Well, the statutory power that exists is still section  
2 3 of the Child Care Act, I suppose, and this policy, I  
3 suppose, reflects again our promotional function in  
4 relation to identifying children who may be at risk.

5 338 Q. Who may be at risk? 15:05

6 A. And then, I suppose, following this procedure, I  
7 suppose, again, assisting us perhaps in sharing  
8 information with relevant third parties to take  
9 protective action in respect of that potential risk.

10 339 Q. Okay. And I think part C of the document sets out the 15:05  
11 procedures for responding to an allegation that has  
12 been made in relation to a child, isn't that correct?  
13 And that is at page 2798 of the materials.

14 A. Yes.

15 340 Q. Now, the first thing the agency does is, it receives a 15:06  
16 report, and:

17  
18 *"On the basis of the reported concern or existing*  
19 *information there is reason to believe that a child has*  
20 *been harmed or is at risk of further harm or ongoing 15:06*  
21 *neglect or that their safety or welfare is at risk, the*  
22 *concern must be followed up immediately and any*  
23 *necessary interventions made."*

24  
25 And that is immediately -- reports which are of 15:06  
26 immediate concern, is that correct?

27 A. That's correct. Where there is immediate risk, like I  
28 said, they should be followed up immediately.

29 341 Q. And there is an immediate protective action plan set

1 out underneath that at paragraph 10, isn't that  
2 correct?

3 A. That's correct.

4 342 Q. Now, again, at paragraph 11, notifying An Garda  
5 Síochána is set out. And it refers back, first of all, 15:06  
6 to the Children's First, that it provides that:

7  
8 *"where the Child and Family Agency suspects that a*  
9 *child has been or is being physically or sexually*  
10 *abused or willfully neglected, An Garda Síochána must* 15:07  
11 *be formally notified in accordance with the procedures*  
12 *set out in paragraph 7 of the Children's First*  
13 *Guidelines."*

14  
15 And that has already been opened, isn't that correct? 15:07

16 A. That's correct.

17 343 Q. And then it sets out:

18  
19 *"The social worker should follow the procedures set out*  
20 *in the Children's First Guidelines."* 15:07

21  
22 And specifically with regard to retrospective  
23 allegations, paragraph 11.4 of this document says that:

24  
25 *"where an individual is making a retrospective* 15:07  
26 *allegation, a contact should also be made with An Garda*  
27 *Síochána to inquire as to whether the person alleging*  
28 *the abuse is known to An Garda Síochána and to*  
29 *ascertain whether a statement has been made. where the*

1 *report to the Child and Family Agency indicates that a*  
2 *statement has been made to An Garda Síochána, the*  
3 *social worker should confirm with An Garda Síochána*  
4 *that that is the case."*

5  
6 Now, that appears to me to be an additional step to  
7 what is contained in the Children's First Guidelines,  
8 and I wonder could you explain how this paragraph got  
9 to be included in this particular policy document,  
10 please?

11 A. Well, specifically, I suppose, because this relates to  
12 retrospective allegations of abuse, the requirement  
13 here, I suppose, is to clarify whether any matter that  
14 might have been known to the Gardaí previously, I  
15 suppose, in relation to a criminal investigation and  
16 just to clarify what the outcome of that criminal  
17 investigation may have been in respect of that. So  
18 that's why this additional step was placed in this  
19 document, I suppose to try and again ensure effective  
20 communication and collaboration between ourselves in  
21 relation to historical allegations of abuse.

22 344 Q. So when this Tribunal has heard that Ms. McGlone wrote  
23 to the Gardaí in August 2013, prior to notifying the  
24 Gardaí of the retrospective allegation, that in effect  
25 is what she was doing, is that correct?

26 A. She was seeking -- I believe, she was seeking just  
27 to -- yes, to clarify what information the Gardaí may  
28 have held in respect of the matter.

29 345 Q. And even this document didn't come into effect until





1           "-- explain that they, the complainant, will need to be  
2 interviewed so that a full account of their story can  
3 be taken; inform them that this is the first stage of  
4 the assessment which will have a particular status  
5 being used as the reference point for the further           15:10  
6 assessment to be undertaken with the alleged abuser to  
7 determine if any children are currently at risk or  
8 whether there is a future risk to children yet to be  
9 identified; be clear with the complainant that the  
10 social worker's task is to assess the allegations and           15:11  
11 should explain that no further action can be taken  
12 until such time as a professional determination on the  
13 reliability of the allegations has been made."  
14

15           So was that something new that came in, in 2014 or was           15:11  
16 it something that you would expect --

17       A.    Well, the specific provisions of this and the specific  
18 procedural elements of this were quite new, I suppose,  
19 in that context. Prior to that I suppose there was a  
20 general recognition of an obligation in relation to           15:11  
21 retrospective abuse, and our obligations to promote the  
22 welfare of children in that context. But the specific  
23 procedures wouldn't have been outlined in this detail  
24 prior to this policy being implemented.

25   349   Q.    So, when you say they wouldn't have been outlined in           15:11  
26 that detail, generally they would have been known that  
27 that was a good procedure to follow, is that fair?

28       A.    Well, generally there was an acceptance and  
29 responsibility to consider retrospective abuse

1           allegations and to try and identify children who could  
2           be potentially at risk and to proceed on that basis to  
3           assess that risk, and to share relevant information  
4           with other people. Obviously, we always try and work  
5           in a fair and open and transparent way, where possible, 15:12  
6           and that would be general good practice, unless sharing  
7           or -- unless that would create an additional risk to a  
8           child, we would always do that in a very open and  
9           transparent way. But, I suppose, this policy outlined  
10          the very specific procedural steps to be followed, 15:12  
11          which hadn't been in place, I suppose, prior to that.

12 350 Q.   Okay. And then D:

13  
14           *"Inform the complainant that as per the requirements of*  
15           *the Children's First, An Garda Síochána has been* 15:12  
16           *notified of the report and that they can, if they have*  
17           *not already done so, make a statement to An Garda*  
18           *Síochána at any point. Following this, the social*  
19           *worker should finalise the arrangement with the*  
20           *complainant to undertake the first stage of the* 15:12  
21           *assessment. The social worker must then confirm to the*  
22           *complainant in writing that the first stage of the*  
23           *assessment will be carried out and the details of where*  
24           *and when the first stage of the assessment will take*  
25           *place."* 15:13

26           A.   That's correct.

27 351 Q.   Yes. And then there is a section 14: *"Refusal to*  
28           *engage in the first stage of the assessment."* And it  
29           essentially sets out that if that happens:

1  
2           *"If the complainant refuses to participate in the*  
3           *assessment procedure, that the social worker should*  
4           *explain that work on progressing the assessment of risk*  
5           *posed by the alleged abuser will be compromised as the* 15:13  
6           *social work office will be limited in the actions it*  
7           *can take with regard to the alleged abuser."*  
8           A.    That's correct.  
9   352   Q.    And also it should be explained that if the complainant  
10           refuses to engage in the first stage, that it doesn't 15:13  
11           close the door to engaging, that can be done at a later  
12           time should the complainant want to do that, is that  
13           correct? That is at 14.2.  
14           A.    That's correct.  
15   353   Q.    Now, if the complainant doesn't engage with the social 15:13  
16           worker, do you envisage that any further action will be  
17           taken by the Child and Family Agency in relation to  
18           cases of retrospective abuse?  
19           A.    There is still an obligation on the agency to come to a  
20           conclusion in respect of the matter and to proceed on 15:14  
21           the basis of that conclusion or not proceed if the  
22           conclusion is an unfounded outcome. But we still have  
23           to proceed -- to come to a determination in respect of  
24           the allegation and then take whatever appropriate steps  
25           should happen at that point in time. 15:14  
26   354   Q.    And you do it on the basis of the information available  
27           to you --  
28           A.    Absolutely.  
29   355   Q.    -- is that correct? Now, just in relation to this

1 particular matter that the Tribunal is dealing with, it  
2 would appear that when Ms. McLoughlin decided to deal  
3 with the matter, her superior, Séamus Deeney, decided  
4 that the following steps should be followed in relation  
5 to the retrospective report. This is at page 456 of 15:15  
6 the materials. It should come up in front, yes. So  
7 Mr. Deeney wrote to McLoughlin and said:

8  
9 *"We discussed this case yesterday. We decided that we*  
10 *would contact the alleged victim as there is some* 15:15  
11 *discrepancy in the allegations forwarded to us. This*  
12 *will allow us to check the reliability and accuracy of*  
13 *the allegations and determine whether there is a*  
14 *foundation to the allegations."*

15 15:15  
16 So that, in essence, was following the procedure that I  
17 have just outlined there to you, is that correct?

18 A. Technically, yes.

19 356 Q. Yes.

20 A. It would be, yes. 15:15

21 357 Q. Even though this predated, I think -- oh, no, this was  
22 the 2015.

23 A. Yes. It's when the standard policy was in place.

24 358 Q. So it was following that policy?

25 A. Yes. 15:15

26 359 Q. And then:

27  
28 *"2. Determine whether we need to interview anyone else*  
29 *who may be of relevance, e.g. the counsellor."*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29

So that again would be following the policy in 2014, is that correct?

A. That's correct.

360 Q. And then: *"On review of the above, inform the alleged abuser of the allegations."* 15:16

A. That's correct.

361 Q. That's correct. And that comes later on in the policy, and I don't intend to go into it in any detail here, and then: 15:16

*"Plan the action to be taken to inform third parties in relation to the allegations, e.g." -- his wife in this particular instance -- "and determine protective action and plan for the case".* Is that right? 15:16

A. Well, I mean, step 3 obviously would have been slightly more to just informing him, obviously. There would be an obligation to meet with the person, to interview them, to take them through, I suppose, the concerns in relation to it, to seek their response in relation to that. And then following that, I suppose, consideration of all the relevant information then at that point in time to determine provisional outcome, as outlined in the policy document, to share that provisional outcome with the person who has allegedly caused harm, to seek any additional information at that point and then to come to a final conclusion at that point and then share relevant information based on that founded outcome at that point. 15:16

1 362 Q. Yes.

2 A. Yes.

3 363 Q. So the second stage of the -- the first stage of the  
4 assessment is meeting the complainant?

5 A. The first stage is meeting the complainant. 15:17

6 364 Q. The second stage of the assessment, engaging with the  
7 alleged abuser, in the policy, and that is at page 2807  
8 of the materials. And it sets out that once step one  
9 is finished, that you write to the alleged abuser at  
10 the earliest stage, and it sets out the contents of 15:17  
11 the -- what the letter should contain, isn't that  
12 correct?

13 A. That's correct, yes.

14 365 Q. And that is an up-to-date policy, is that correct, in  
15 relation to the contents of what should be set out to 15:17  
16 the alleged abuser at that stage?

17 A. Yes. I suppose the policy was informed fundamentally  
18 probably from the Barr judgment at the time, I suppose  
19 in relation to the type of information that should be  
20 shared with, and there are template letters, like I 15:18  
21 said, in the --

22 366 Q. In the policy?

23 A. -- in the appendices of the document that outline the  
24 general type of letters that should be written to in  
25 respect of the person who has allegedly caused harm. 15:18

26 367 Q. And I think the draft letter is contained at Appendix 3  
27 at page 2827 of the materials. It should come up in  
28 front of you now. Yes, I think it's set out there.

29 A. That's correct, yes.

1 368 Q. And it's part of the policy to set out detail in  
2 relation to the allegations in the letter, is that  
3 correct?

4 A. That's correct.

5 369 Q. And that is your up-to-date policy, am I correct in 15:18  
6 saying that?

7 A. That is our current and active policy in respect of  
8 these matters, yes.

9 370 Q. And it sets out that that correspondence should be sent  
10 by registered post and marked "strictly private and 15:18  
11 confidential, strictly addressee only," is that  
12 correct?

13 A. That's correct.

14 371 Q. You don't have any policies in relation to particular  
15 times, that it may not be the greatest idea to send a 15:19  
16 letter like that to people?

17 A. This policy has been subject, or is subject currently  
18 to review, and certainly one of the aspects that have  
19 arisen out of that review, I suppose, from  
20 practitioners is the requirement, perhaps, to have a 15:19  
21 pre-meeting with the person who allegedly caused harm,  
22 to invite them in to try and discuss, not the specific  
23 allegations but just to inform them obviously, to  
24 confirm their identity, to offer support or make sure  
25 they had support and advices in relation to them before 15:19  
26 they would then come to us to discuss the allegations.  
27 So there is a recommendation as part of the review to  
28 have a pre-step to actually sending the detail out to  
29 the individual and that what we would do -- what is

1 recommended is, when they come in to meet with us, we  
2 would provide them then with a hard copy of, obviously,  
3 the detailed allegations at that point, so that is a  
4 recommendation of the review of the policy presently,  
5 which just hasn't concluded yet. 15:20

6 372 Q. And then I think your policy then sets out the steps to  
7 be taken where the alleged abuser refuses to engage the  
8 meeting with an alleged abuser, whether they should be  
9 legally represented during the initial interview, in  
10 situations where the alleged abuser is under 18 years 15:20  
11 of age, what happens after the initial interview, that  
12 there may be a further assessment in relation to the  
13 matter, that a provisional conclusion is come to, a  
14 final conclusion, and the -- in appropriate cases, that  
15 third parties be notified if it is concluded that that 15:20  
16 is an appropriate course of action, is that correct?

17 A. So that is -- the letter sets out basically the stages  
18 of the process that would be gone through so that the  
19 individual has full knowledge, A, of the matters to  
20 which they are asked to discuss with us, and also then 15:21  
21 what the stages in the process that took place, to make  
22 sure, again, that we are applying fair procedures and  
23 transparency in relation to how we conduct our business  
24 in respect of these matters.

25 373 Q. And just in very general terms, would you expect all of 15:21  
26 your social workers, team leaders and area managers to  
27 be very familiar with these documents and the policies  
28 of the Child and Family Agency?

29 A. Yes. I would expect that all staff would be aware of



1 all current policies. They are currently available to  
2 all staff through what we call our intranet, hubs, so  
3 they are accessible to staff through their computers,  
4 and that, at any point in time in relation to  
5 compliance with those policies and procedures.

15:21

6 374 Q. And is there ongoing training provided to staff in  
7 relation to policies?

8 A. Depending on the need or depending on the requirement  
9 if that is identified, then those kind of issues can be  
10 addressed, yes.

15:21

11 375 Q. Okay. I don't know if there is anything else in  
12 particular you want to draw to the Tribunal's attention  
13 with regard to policies? Do you think is there  
14 anything you would like to add?

15 A. I don't believe so at this point in time, unless there  
16 is any specific questions in relation to policy  
17 matters, no, thank you.

15:22

18 **MS. LEADER:** Thank you very much. If you would answer  
19 any questions anybody else might have for you,  
20 Mr. Quinlan.

15:22

21  
22 **MR. QUINLAN WAS CROSS-EXAMINED BY MR. MCGARRY:**

23  
24 376 Q. **MR. MCGARRY:** Mr. Quinlan, Paul McGarry is my name. I  
25 represent Sergeant McCabe. Am I correct in  
26 understanding that your evidence to the Tribunal is  
27 directed at what should happen ideally in every case?

15:22

28 A. That's correct. I suppose my position is to outline  
29 the policy position that exists in the agency or

1           previously perhaps within the child and family  
2           services, if that is possible.

3   377   Q.    And you were asked some questions about this by  
4           Ms. Leader. Am I to understand that you have looked at  
5           the files and documents in relation to the matters that   15:22  
6           are the subject of the terms of reference here?

7           A.    No, I wouldn't have conducted a full review of the  
8           specific file in relation to this. That wouldn't be a  
9           role and function of myself as director of policy. So  
10          I would obviously be aware of some of the issues,           15:23  
11          obviously, as a member of the senior management team,  
12          arising during the course of the Tribunal.

13   378   Q.    Well, obviously you have followed what has been going  
14          on here with regard to your agency and you are familiar  
15          with what the position is?                                   15:23

16          A.    That's correct.

17   379   Q.    And the evidence of the various people that have  
18          given -- that have come here and testified from your  
19          agency?

20          A.    I would have knowledge, yes, of some of the evidence, I   15:23  
21          suppose, that people have provided to the Tribunal,  
22          yes.

23   380   Q.    You see, I have to suggest to you that there has been a  
24          complete failure to comply with the various obligations  
25          on the part of your agency at every level in the           15:23  
26          process.

27          A.    My understanding is, from reviewing the information,  
28          that there certainly has been failures in relation to  
29          compliance with policy in respect of this matter,

1 that's true. And I also understand, I suppose, that my  
2 colleague, the chief operations -- Jim Gibson, has  
3 given, I suppose, absolute clarity to the Tribunal that  
4 there has been a failure in respect of oversight and  
5 governance of matters, as well, in relation to matters 15:24  
6 before the Tribunal.

7 381 Q. Well, leave aside oversight and governance. I am  
8 talking about the facts with regard to compliance with  
9 the things you have been telling us about this  
10 afternoon? 15:24

11 A. I believe there is, at times, partial compliance with  
12 elements of policy but not full compliance with  
13 elements of policy.

14 382 Q. Well, I am not going to go through them all in detail,  
15 but I am suggesting to you, without the need to go 15:24  
16 through them all in detail, that there has been a  
17 complete failure to comply with those obligations on so  
18 many different levels by so many different people at  
19 every stage in the process?

20 A. Like I said, I believe there has been partial 15:24  
21 compliance at times with elements of the policy but  
22 there has been significant, I would say, deficits in  
23 relation to compliance with elements of the policy in  
24 respect of these matters.

25 383 Q. For example, you referred in the statement or the 15:24  
26 document that you prepared for the Tribunal to the  
27 obligation, the legal obligation in relation to fair  
28 procedures and how the person against whom the  
29 allegation of abuse is treated. Would you accept that

1           there has been a complete failure to comply with those  
2           obligations?

3           A.    Well, I believe in relation to this particular policy  
4           and the fair procedures outlined, I believe that the  
5           evidence before the Tribunal is that there was an  
6           attempt obviously to share and follow the procedure as  
7           outlined in the five steps that were just presented to  
8           me earlier in relation to that, so there was an attempt  
9           to comply with some element of the policy but that  
10          wasn't, I believe, followed with rigour.

15:25

15:25

11 384 Q.    So it wasn't followed up, the five steps were not  
12           complied with, isn't that right?

13          A.    My understanding is -- again, I suppose my knowledge is  
14           limited, I suppose I would say, in that, because I  
15           haven't done a full file review of this matter. It  
16           wouldn't be a role and function of myself, as director  
17           of policy, to review. That is a matter for the  
18           internal review to look at the specific, but I am aware  
19           from some of the evidence obviously before the Tribunal  
20           that there has been failures in that regard, yes.

15:25

15:25

21 385 Q.    Well, I am suggesting to you that the failures exist at  
22           every level. They exist, for example, at the level of  
23           compliance with the Children's First Guidelines, they  
24           exist with the compliance with the notification  
25           procedure and the interaction with An Garda Síochána,  
26           they exist in relation to the record-keeping  
27           obligations that are contained in the guidelines that  
28           you have set out, they exist in relation to the manner  
29           in which you deal with the alleged person concerned,

15:26

1           they exist in relation to data protection issues.

2           A.     Certainly, like I said, there has been partial  
3           compliance, I would say, with some elements. Some  
4           notifications have taken place. Obviously there was  
5           errors in relation to information that was notified,           15:26  
6           but if someone was following the policies correctly,  
7           they would have taken different steps, definitely, in  
8           relation to those matters.

9   386   Q.     And are you and other senior people in the organisation  
10           not astonished and alarmed at the level of failure, at           15:26  
11           the level of breakdown in this particular case?

12           A.     Like I said, I believe the agency accepts that there  
13           was clear governance and oversight issues in relation  
14           to non-compliance with matters here, absolutely.

15   387   Q.     I am just concerned that you seem to be putting this in           15:27  
16           the context of governance and oversight and ignoring  
17           the actual -- the factual issues that occurred on the  
18           ground from the very beginning, from when Laura Brophy  
19           sends in the notification to when Laura Connolly  
20           retypes it and puts it in a different format, to when           15:27  
21           that is forwarded to An Garda Síochána, right the way  
22           along, up to the point at which the Barr letter gets to  
23           be sent and the matter then is sent on to SART in 2016,  
24           at every level there seems to be a complete failure to  
25           comply with the obligations?           15:27

26           A.     And that is what I am saying, I suppose, in relation  
27           to, I think we have already, like I said, said, when I  
28           say governance oversight, I mean that I suppose  
29           management has, I suppose, responsibility for ensuring

1 that effective policy is followed and met and I suppose  
2 wasn't in place at times in relation to these matters,  
3 and that resulted in, yes, clear errors in this case,  
4 that's absolutely -- so it does relate to effective  
5 governance and oversight for management to make sure 15:28  
6 the policies and procedures are followed, right from  
7 the individual workers that deal with the case right up  
8 through the organisation.

9 **MR. MCGARRY:** Thank you.

10  
11 **MR. QUINLAN WAS CROSS-EXAMINED BY MR. DONAL MCGUINNESS:**

12  
13 388 Q. **MR. DONAL MCGUINNESS:** Mr. Quinlan, my name is Donal  
14 McGuinness. I appear on behalf of the Garda  
15 Commissioner and certain other members of An Garda 15:28  
16 Síochána. Just a few questions, if you don't mind.  
17 Could I ask you to have a look at document 1290. This  
18 is a meeting -- minutes of a meeting or an action sheet  
19 that was created arising out of a meeting that took  
20 place in 2007, 24th of April 2007 at 2:15 p.m. Have 15:28  
21 you seen this document before?

22 A. I have not seen this document, no.

23 389 Q. Essentially this document is at the very end of the  
24 process that happened with the HSE in 2007, and it's  
25 essentially the last piece of work that was done on the 15:29  
26 file in 2007. And if you look at the section:

27  
28 *"Reasons for Referral: Ms. D informed CSA team during*  
29 *recent appointment that Mr. McCabe inappropriately*

1 touched her. File returned from the DPP, no  
2 prosecution.

3  
4 *Actions agreed: Mary O'Reilly to contact Catherine*  
5 *Sweeney, principal social worker, in Meath, to ask her* 15:29  
6 *to nominate a member of her team to deal with*  
7 *Mr. McCabe. Social worker to offer Mr. McCabe a risk*  
8 *assessment and to inform him that the HSE are aware of*  
9 *the allegations against him."*

10  
11 Now, there matters lay in 2007. At the same time in  
12 2007, in fact in April of 2007, the Garda investigation  
13 had completely concluded and there was a decision by  
14 the DPP not to prosecute. You accept, therefore, that  
15 the Garda work essentially was done in 2007. 15:29

16 A. I accept if the Gardaí concluded their investigation  
17 and the DPP decided not to proceed, yes, I would assume  
18 that that concluded their business.

19 390 Q. Their job was done effectively. But that record there  
20 seems to indicate that there was a job of work to be 15:30  
21 done by the HSE at that time?

22 A. I suppose as outlined in Children First, I suppose, the  
23 respective responsibilities of the Gardaí and the HSE  
24 at the time, I suppose, are different. Our  
25 responsibilities are in relation to the protection of 15:30  
26 children, both in terms of identified children and  
27 potential risk. So these actions relate to, I suppose,  
28 the possibility of furthering our assessment in  
29 relation to potential risk at this point in time, which

1 is different to the functions of the Gardaí in relation  
2 to a criminal investigation matter.

3 391 Q. Yes. But essentially, the matter was left at the point  
4 where Sergeant McCabe has to be contacted by the HSE  
5 effectively, that is what that record illustrates? 15:30

6 A. According to this action that is what is outlined here,  
7 yes, that's correct.

8 392 Q. And then if you jump forward to page 410, please. This  
9 was the intake record created by Keara McGlone on 9th  
10 of August 2013. And just at the back of that document, 15:31  
11 sorry, page 412, the bottom of that document, she  
12 indicates: *"Duty to Garda notify and await allocation.*  
13 *MTP."*

14 A. That's correct.

15 393 Q. So essentially we have jumped from 2007 to 2013. The 15:31  
16 matter has been reinvigorated by -- at this stage, it  
17 was a verbal call from Laura Brophy indicating that she  
18 had received a retrospective complaint of alleged  
19 abuse. And Keara McGlone creates this intake record on  
20 the 9th of August, and she immediately identifies the 15:32  
21 job of work to be done at that stage is *"Duty to Garda*  
22 *notify, await allocation"*?

23 A. That's -- according to that document, that is what that  
24 says, correct, yes.

25 394 Q. Now, on the hierarchy of things to do before the Garda 15:32  
26 notification is required, do I understand your evidence  
27 to be that a preliminary assessment ought to have taken  
28 place in 2013 as to whether or not there was any  
29 credibility in the complaints?



1 A. Yes. The requirement under our standard operating  
2 procedures is that in any referral we conduct a  
3 preliminary inquiry in relation to that and after a  
4 preliminary inquiry -- but that would be the first  
5 point, I suppose, where you might suspect abuse and 15:32  
6 that's a ground then for notifying the Gardaí in  
7 relation to that matter.

8 395 Q. Yes. And in order to properly carry out that inquiry,  
9 as a matter of course, you would obviously refer back  
10 to the records that were created at the time the abuse 15:32  
11 allegation first emerged?

12 A. Yes. Part of the preliminary inquiry process is to  
13 check the records held by the agency, in addition to,  
14 as I said, other checks that might be required at that  
15 point. 15:33

16 396 Q. And a very useful resource in relation to that  
17 preliminary inquiry would, in fact, be the statement  
18 given by the alleged injured party back at the time?

19 A. If that matter was on file, absolutely, that would be  
20 very relevant information to consider. 15:33

21 397 Q. Yes. And it was on file, it's been established that it  
22 was on file at the time. And assuming, having done all  
23 of that, it may well be the case that that could have  
24 been the end of the matter, if that had been looked at?

25 A. If it was concluded at the end of the preliminary 15:33  
26 inquiry phase that there was no basis to proceed to  
27 initial assessment, in that this was a matter that had  
28 already been dealt with to conclusion, then there would  
29 be no basis to proceed into initial assessment at that

1 point and the matter could be closed.

2 398 Q. Yes. But in any event, would you accept that before  
3 Sergeant McCabe ought to have been approached by -- in  
4 the form of a Barr letter, that it was essential to  
5 talk to Ms. D? 15:34

6 A. As outlined, I suppose in any, yes, assessment process  
7 you would normally start with the complainant, like I  
8 said, in relation to their concerns regarding a matter  
9 and clarify that information, I suppose, before then  
10 proceeding to obviously interview a person allegedly 15:34  
11 causing harm against them, yes.

12 399 Q. Yes. So, in a sense, if the first best step is to go  
13 back to the 2007 file, the second best step before you  
14 take any further action is to talk to the complainant  
15 directly, isn't that correct? 15:34

16 A. In relation to an assessment, I mean -- I suppose, at  
17 preliminary inquiry phase you may not proceed to  
18 interview the complainant at that point in time. You  
19 might be dealing with the individual who has referred  
20 the matter to you and then you would be checking 15:34  
21 historical records. If you are going out to interview  
22 a complainant, you would have proceeded into an  
23 assessment phase at that stage. So that would be  
24 beyond preliminary inquiry, that would be into what we  
25 call the initial assessment phase of our work. 15:34

26 400 Q. Yes, yes. But you accept in this case, obviously, that  
27 step was missed going back to Ms. D before going to  
28 Sergeant McCabe, that step was in fact missed, in this  
29 particular case?

1 A. My understanding is, and again I suppose, that if at  
2 this point in time they were reactivating the matter  
3 and they -- the first stage would have been, yes, to  
4 clarify information in respect of the complainant, and  
5 then proceed I suppose on that basis. 15:35

6 401 Q. Yes. Proceed to the next step?

7 A. Yes.

8 402 Q. Yes. Which would be notification of Sergeant McCabe?

9 A. That's correct.

10 403 Q. Thank you. 15:35

11

12 **MR. QUINLAN WAS RE-EXAMINED BY MS. LEADER:**

13 404 Q. **MS. LEADER:** Just one question: Do you know when the  
14 review of the file would have been completed in Tulsa?

15 A. I don't have specific information on that at this 15:35  
16 stage. That is a matter that -- I believe a draft of  
17 the report is with the chief operations officer, but I  
18 don't have a specific date as to when that will be  
19 concluded.

20 **MS. LEADER:** Thank you very much. 15:35

21 **CHAIRMAN:** Thanks.

22

23 **THE WITNESS THEN WITHDREW**

24

25 **MR. MCGUINNESS:** That is the completed list of 15:36  
26 witnesses for today, Chairman. So we have a schedule  
27 of witnesses for tomorrow at whatever appropriate time  
28 is possible.

29 **CHAIRMAN:** Yes. Tomorrow I can't sit before 2:00

1 because of matters in the other place, but we will try  
2 and sit through for as long as we can. I don't know  
3 whether you need to revise the list or inform people  
4 accordingly, but we will do our best to get through as  
5 much as we can. Thank you.

15:36

6  
7 **THE HEARING WAS THEN ADJOURNED TO THURSDAY, 27TH JULY**  
8 **2017 AT 2:00PM**

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29

	100:28	<b>27TH</b> [1] - 116:7	<b>5.21</b> [1] - 81:26	107:29, 112:19, 113:5, 113:10
	<b>2000</b> [1] - 48:29	<b>2800</b> [1] - 96:13		<b>abused</b> [2] - 83:8, 94:10
<b>'14</b> [1] - 45:15	<b>2001</b> [1] - 24:20	<b>2801</b> [1] - 96:28	<b>6</b>	<b>abuser</b> [14] - 76:24, 92:4, 92:11, 92:21, 97:6, 99:5, 99:7, 101:6, 102:7, 102:9, 102:16, 104:7, 104:8, 104:10
<b>'16</b> [1] - 25:21	<b>2002</b> [2] - 24:22, 49:4	<b>2807</b> [1] - 102:7	<b>6</b> [1] - 5:4	
<b>'Commissioner</b> [1] - 31:22	<b>2003</b> [1] - 24:27	<b>2827</b> [1] - 102:27	<b>60</b> [1] - 5:18	
<b>'no</b> [1] - 41:3	<b>2006</b> [2] - 37:21, 44:16	<b>2886</b> [1] - 45:25	<b>64</b> [1] - 5:20	
<b>'Operation</b> [1] - 24:24	<b>2006/2007</b> [1] - 24:29	<b>29th</b> [1] - 34:12		
<b>'Prime</b> [1] - 42:25	<b>2007</b> [14] - 7:2, 37:21, 44:16, 56:3, 110:20, 110:24, 110:26, 111:11, 111:12, 111:15, 112:15, 114:13	<b>2:00</b> [2] - 62:5, 115:29	<b>7</b>	<b>abuser's</b> [1] - 91:18
<b>'what</b> [1] - 31:24	<b>2009</b> [2] - 25:3, 75:16	<b>2:00PM</b> [1] - 116:8	<b>7</b> [6] - 2:17, 79:4, 79:7, 79:11, 82:26, 94:12	<b>AC</b> [1] - 34:28
<b>'yes</b> [1] - 41:3	<b>2010</b> [6] - 72:21, 72:23, 72:24, 75:3, 75:7	<b>2:15</b> [3] - 6:5, 63:5, 110:20	<b>7.4.1</b> [1] - 83:5	<b>accept</b> [5] - 107:29, 111:14, 111:16, 114:2, 114:26
<b>1</b>	<b>2010</b> [6] - 72:21, 72:23, 72:24, 75:3, 75:7	<b>2:30</b> [1] - 40:22	<b>7.4.5</b> [2] - 83:11, 85:6	<b>acceptance</b> [1] - 97:28
<b>10</b> [2] - 45:25, 94:1	<b>2011</b> [8] - 46:5, 64:25, 64:26, 75:15, 75:21, 81:18, 81:22, 89:24	<b>2nd</b> [1] - 23:3	<b>7.5</b> [1] - 88:9	<b>accepts</b> [1] - 109:12
<b>105</b> [1] - 5:23	<b>2013</b> [15] - 25:16, 25:18, 25:19, 49:4, 49:6, 49:7, 73:14, 79:27, 85:2, 85:3, 95:23, 96:2, 112:10, 112:15, 112:28	<b>3</b>	<b>70</b> [1] - 5:22	<b>access</b> [6] - 27:11, 27:13, 27:20, 27:22, 27:23, 30:8
<b>1069</b> [1] - 55:15	<b>2014</b> [30] - 1:4, 7:15, 8:7, 9:9, 13:14, 22:26, 23:3, 25:12, 28:1, 28:5, 39:16, 42:23, 47:1, 59:5, 65:11, 65:26, 67:7, 72:14, 73:1, 79:28, 81:21, 82:13, 89:21, 90:14, 90:16, 90:19, 96:1, 97:15, 101:2	<b>3</b> [5] - 73:3, 91:4, 93:2, 101:16, 102:26	<b>7th</b> [4] - 23:3, 55:16, 55:19, 56:29	<b>accessible</b> [1] - 105:3
<b>10:00</b> [1] - 62:4	<b>2015</b> [5] - 49:18, 51:5, 55:16, 57:2, 100:22	<b>3.6</b> [1] - 76:7		<b>accordance</b> [3] - 83:10, 92:12, 94:11
<b>11</b> [4] - 24:12, 48:16, 64:10, 94:4	<b>2016</b> [4] - 25:5, 46:5, 61:24, 109:23	<b>3.6.1</b> [1] - 76:13	<b>8</b>	<b>according</b> [2] - 112:6, 112:23
<b>11.4</b> [1] - 94:23	<b>2017</b> [7] - 1:6, 1:10, 1:18, 6:2, 42:24, 64:9, 116:8	<b>3.9</b> [1] - 77:9	<b>8</b> [2] - 2:22, 73:13	<b>accordingly</b> [2] - 14:6, 116:4
<b>11.4</b> [1] - 94:23	<b>21</b> [2] - 3:11, 5:6	<b>3.9.4</b> [1] - 77:20	<b>864</b> [2] - 47:6, 47:24	<b>account</b> [3] - 36:4, 36:18, 97:2
<b>110</b> [1] - 5:24	<b>22:06</b> [1] - 8:7	<b>308</b> [1] - 66:7	<b>88</b> [1] - 2:25	<b>accounting</b> [1] - 6:20
<b>115</b> [1] - 5:25	<b>23rd</b> [1] - 34:11	<b>309</b> [1] - 66:7		<b>accounts</b> [1] - 44:10
<b>1290</b> [1] - 110:17	<b>24</b> [1] - 5:8	<b>31</b> [1] - 5:9		<b>accuracy</b> [3] - 36:16, 36:27, 100:12
<b>12:00</b> [1] - 62:4	<b>24th</b> [1] - 110:20	<b>32</b> [1] - 2:17	<b>9</b>	<b>accurate</b> [8] - 12:21, 19:29, 36:4, 36:18, 37:7, 37:13, 67:9, 81:29
<b>13</b> [1] - 96:11	<b>2665</b> [1] - 70:18	<b>320</b> [1] - 65:19	<b>9s</b> [1] - 70:18	<b>accused</b> [2] - 20:10
<b>13:30</b> [1] - 55:17	<b>2678</b> [1] - 70:20	<b>3209</b> [1] - 48:17	<b>9th</b> [2] - 112:9, 112:20	<b>achieve</b> [1] - 71:23
<b>14</b> [1] - 98:27	<b>26TH</b> [2] - 1:18, 6:1	<b>3256</b> [2] - 13:15, 13:16		<b>acknowledge</b> [1] - 13:19
<b>14.2</b> [1] - 99:13	<b>2704</b> [1] - 76:6	<b>3257</b> [2] - 13:16, 16:7	<b>A</b>	<b>acknowledges</b> [1] - 96:16
<b>14/5/14</b> [3] - 8:12, 8:29, 9:11	<b>2710</b> [1] - 78:19	<b>3260</b> [2] - 8:5, 12:10	<b>ability</b> [1] - 82:1	<b>acknowledging</b> [1] - 96:17
<b>14th</b> [2] - 8:7, 46:14	<b>2719</b> [1] - 79:14	<b>3262</b> [1] - 8:26	<b>able</b> [4] - 50:15, 50:22, 73:20, 89:10	<b>act</b> [5] - 72:16, 73:3, 73:13, 73:25, 91:7
<b>15</b> [1] - 5:5	<b>2730</b> [1] - 81:24	<b>3263</b> [1] - 11:14	<b>above-named</b> [1] - 1:27	<b>ACT</b> [2] - 1:4, 1:9
<b>15th</b> [7] - 9:21, 12:9, 17:19, 47:1, 65:11, 65:26, 67:7	<b>2735</b> [1] - 82:28	<b>3264</b> [1] - 64:9	<b>absence</b> [1] - 92:27	<b>Act</b> [2] - 73:14, 93:2
<b>16</b> [1] - 1:6	<b>2736</b> [1] - 85:6	<b>3285</b> [1] - 24:12	<b>absolute</b> [1] - 107:3	<b>acted</b> [3] - 79:19, 79:26, 79:28
<b>16th</b> [7] - 13:14, 28:1, 28:4, 32:10, 34:14, 35:10, 39:28	<b>2786</b> [1] - 70:23	<b>3291</b> [1] - 28:2	<b>absolutely</b> [16] - 15:16, 16:6, 26:18, 26:27, 27:9, 29:19, 38:3, 44:25, 80:16, 84:7, 89:9, 99:28, 109:14, 110:4, 113:19	<b>acting</b> [2] - 25:12, 25:18
<b>17</b> [2] - 1:10, 1:18	<b>2793</b> [1] - 91:3	<b>39</b> [1] - 5:10	<b>abuse</b> [38] - 9:5, 9:7, 9:18, 10:26, 11:7, 16:21, 16:22, 21:21, 21:26, 23:1, 23:18, 33:7, 34:4, 43:17, 70:23, 76:15, 77:4, 77:7, 78:4, 82:14, 83:12, 83:16, 84:2, 89:20, 90:2, 90:9, 94:28, 95:12, 95:21, 97:21, 97:29, 99:18,	<b>action</b> [24] - 1:28, 8:14, 35:24, 42:22, 50:10, 56:2, 68:4, 74:29, 82:6, 84:28, 89:11, 91:20, 91:27, 92:11, 93:9, 93:29,
<b>1716</b> [2] - 22:27	<b>2798</b> [1] - 93:13	<b>3:10</b> [1] - 40:23		
<b>18</b> [1] - 104:10		<b>3rd</b> [2] - 22:26, 43:25		
<b>1921</b> [1] - 1:10		<b>4</b>		
<b>1988</b> [1] - 64:20		<b>4</b> [1] - 3:2		
<b>1990s</b> [1] - 74:18		<b>4.5</b> [1] - 77:27		
<b>1993</b> [1] - 64:22		<b>4.6</b> [1] - 78:18		
<b>1995</b> [1] - 48:24		<b>41</b> [1] - 5:11		
<b>1997</b> [1] - 71:16		<b>410</b> [1] - 112:8		
<b>1999</b> [3] - 75:18, 75:19, 90:25		<b>412</b> [1] - 112:11		
<b>19th</b> [1] - 64:9		<b>43</b> [1] - 5:12		
		<b>45</b> [2] - 5:13, 5:15		
		<b>456</b> [1] - 100:5		
		<b>48</b> [1] - 5:17		
		<b>5</b>		
<b>2</b> [7] - 2:26, 2:29, 3:2, 3:11, 3:21, 86:8,		<b>5.2.1</b> [1] - 79:16		
		<b>5.2.3</b> [1] - 81:1		

97:11, 99:16,  
101:12, 101:14,  
104:16, 110:18,  
112:6, 114:14  
**actions** [8] - 14:18,  
17:27, 20:19, 42:23,  
56:5, 99:6, 111:4,  
111:27  
**active** [1] - 103:7  
**actively** [1] - 88:18  
**actual** [3] - 22:5,  
22:22, 109:17  
**adamant** [1] - 29:25  
**add** [1] - 105:14  
**addition** [2] - 88:27,  
113:13  
**additional** [8] - 74:10,  
80:25, 81:16, 81:19,  
95:6, 95:18, 98:7,  
101:26  
**address** [3] - 32:16,  
56:17, 80:25  
**addressed** [4] - 22:21,  
66:18, 75:28, 105:10  
**addressee** [1] -  
103:11  
**adequate** [2] - 73:21,  
91:8  
**adequately** [1] - 82:1  
**ADJOURNED** [2] -  
63:7, 116:7  
**adopted** [1] - 90:23  
**adult** [3] - 74:21,  
74:24, 96:11  
**adults** [3] - 76:9,  
76:15, 76:17  
**advance** [1] - 54:12  
**Advanced** [1] - 6:23  
**adverse** [1] - 23:22  
**advice** [10] - 8:22,  
8:23, 15:6, 17:16,  
18:8, 42:4, 42:19,  
65:7, 65:11, 71:6  
**advices** [1] - 103:25  
**advise** [4] - 12:13,  
13:10, 17:29, 56:8  
**advised** [5] - 10:15,  
11:27, 14:12, 19:9,  
19:18  
**affairs** [2] - 6:15, 7:2  
**afforded** [1] - 56:7  
**AFTER** [1] - 64:1  
**afternoon** [1] - 107:10  
**afterwards** [1] - 68:22  
**age** [1] - 104:11  
**agencies** [6] - 75:29,  
77:22, 77:27, 79:7,  
83:14, 88:10  
**agency** [22] - 19:25,  
73:1, 73:28, 80:2,  
80:6, 80:26, 81:13,  
81:15, 84:9, 84:25,  
84:27, 88:23, 90:1,  
92:28, 93:15, 99:19,  
105:29, 106:14,  
106:19, 106:25,  
109:12, 113:13  
**Agency** [21] - 70:27,  
71:23, 72:3, 72:6,  
72:14, 72:16, 73:1,  
73:13, 73:25, 75:5,  
75:28, 79:25, 91:6,  
91:12, 91:23, 92:10,  
92:19, 94:8, 95:1,  
99:17, 104:28  
**ago** [1] - 22:21  
**agree** [1] - 62:1  
**agreed** [8] - 36:4,  
40:2, 53:5, 53:11,  
54:1, 54:14, 57:15,  
111:4  
**agreeing** [2] - 44:8,  
61:21  
**ahead** [4] - 40:2, 40:3,  
40:4, 40:9  
**ALAN** [1] - 3:1  
**alarmed** [1] - 109:10  
**alerted** [1] - 59:8  
**ALISON** [1] - 4:6  
**allegation** [16] - 10:1,  
23:6, 34:4, 37:18,  
37:19, 37:29, 38:6,  
90:2, 90:5, 90:9,  
93:11, 94:26, 95:24,  
99:24, 107:29,  
113:11  
**allegations** [25] - 9:5,  
37:21, 44:17, 56:6,  
56:10, 70:22, 82:14,  
89:20, 91:19, 94:23,  
95:12, 95:21, 97:10,  
97:13, 98:1, 100:11,  
100:13, 100:14,  
101:6, 101:13,  
103:2, 103:23,  
103:26, 104:3, 111:9  
**alleged** [25] - 32:4,  
32:7, 56:13, 76:24,  
78:4, 78:28, 91:18,  
92:4, 92:11, 92:15,  
92:21, 97:6, 99:5,  
99:7, 100:10, 101:5,  
102:7, 102:9,  
102:16, 104:7,  
104:8, 104:10,  
108:29, 112:18,  
113:18  
**allegedly** [4] - 101:25,  
102:25, 103:21,  
114:10  
**alleging** [1] - 94:27  
**allocate** [1] - 87:7  
**allocated** [1] - 52:29  
**allocating** [1] - 58:24  
**allocation** [8] - 51:24,  
80:9, 80:12, 80:19,  
80:22, 80:28,  
112:12, 112:22  
**allow** [1] - 100:12  
**alternative** [1] - 50:8  
**amount** [2] - 41:4,  
44:15  
**amplification** [1] -  
38:15  
**AND** [5] - 1:4, 1:5, 1:9,  
3:23, 3:26  
**annex** [1] - 40:11  
**anonymous** [2] -  
46:24, 69:17  
**answer** [10] - 15:17,  
20:8, 31:1, 32:27,  
33:13, 37:4, 41:2,  
60:3, 70:4, 105:18  
**answered** [1] - 47:8  
**ANTHONY** [1] - 2:27  
**anxious** [2] - 12:26,  
21:9  
**apart** [1] - 58:18  
**apologies** [1] - 6:4  
**apologised** [1] - 66:21  
**apologising** [1] -  
66:28  
**appeals** [1] - 7:7  
**appear** [5] - 28:3,  
42:2, 89:17, 100:2,  
110:14  
**APPEARANCES** [1] -  
2:1  
**appeared** [1] - 53:28  
**appearing** [1] - 31:7  
**appendices** [1] -  
102:23  
**Appendix** [1] - 102:26  
**apply** [3] - 41:1, 90:3,  
96:4  
**applying** [1] - 104:22  
**appoint** [1] - 86:28  
**appointed** [3] - 72:23,  
72:25, 87:25  
**appointment** [3] -  
54:2, 57:24, 110:29  
**appointments** [2] -  
57:26, 62:4  
**appreciate** [2] - 41:6,  
41:17  
**appreciating** [1] -  
41:11  
**approached** [1] -  
114:3  
**appropriate** [16] -  
14:9, 50:25, 50:28,  
51:1, 53:5, 53:14,  
53:19, 61:12, 69:13,  
69:14, 83:14, 91:26,  
99:24, 104:14,  
104:16, 115:27  
**appropriately** [1] -  
67:23  
**approved** [1] - 47:23  
**April** [4] - 25:21,  
79:28, 110:20,  
111:12  
**area** [12] - 10:13, 46:7,  
47:20, 49:19, 49:25,  
59:5, 64:24, 65:6,  
73:9, 81:28, 104:26  
**areas** [4] - 27:27,  
58:14, 71:8, 75:26  
**arisen** [2] - 65:12,  
103:19  
**arising** [4] - 19:21,  
44:27, 106:12,  
110:19  
**Armagh** [1] - 48:27  
**arose** [1] - 89:25  
**ARRAN** [1] - 2:17  
**arranged** [1] - 54:11  
**arrangement** [1] -  
98:19  
**arranges** [2] - 86:11,  
86:22  
**arranging** [1] - 25:28  
**arrived** [3] - 28:7,  
31:17, 31:22  
**ARTHUR** [1] - 2:28  
**AS** [4] - 6:1, 64:1,  
64:6, 70:15  
**ascertain** [2] - 53:4,  
94:29  
**ascertained** [1] -  
61:11  
**aside** [1] - 107:7  
**aspects** [1] - 103:18  
**assess** [6] - 74:22,  
74:23, 87:7, 91:13,  
97:10, 98:3  
**assessed** [1] - 53:8  
**assessing** [1] - 51:29  
**assessment** [30] -  
50:10, 78:26, 79:13,  
79:15, 81:3, 81:8,  
81:24, 83:16, 90:3,  
92:20, 97:4, 97:6,  
98:21, 98:23, 98:24,  
98:28, 99:3, 99:4,  
102:4, 102:6,  
104:12, 111:8,  
111:28, 112:27,  
113:27, 113:29,  
114:6, 114:16,  
114:23, 114:25  
**assign** [4] - 87:4, 87:5,  
87:6, 87:22  
**assigned** [5] - 25:2,  
25:3, 71:29, 86:12,  
86:23  
**assist** [3] - 39:13,  
45:10, 51:16  
**assistance** [3] - 49:19,  
51:6, 60:12  
**assistant** [38] - 23:15,  
24:14, 25:1, 25:4,  
25:6, 25:9, 25:13,  
25:23, 25:26, 26:3,  
26:4, 26:21, 26:23,  
27:11, 27:18, 27:20,  
27:22, 29:10, 29:17,  
29:23, 30:3, 31:8,  
31:27, 34:13, 37:24,  
38:12, 38:24, 42:2,  
42:5, 42:12, 43:3,  
43:20, 43:23, 43:26,  
44:1, 44:12, 44:14,  
72:22  
**Assistant** [30] - 25:17,  
25:21, 26:8, 26:27,  
27:15, 28:8, 28:19,  
29:29, 30:9, 31:18,  
32:11, 32:15, 32:19,  
32:26, 32:29, 33:12,  
33:28, 34:21, 35:11,  
36:1, 36:15, 36:21,  
37:11, 38:23, 39:27,  
40:10, 42:17, 42:18,  
44:18, 45:8  
**assisted** [1] - 8:24  
**assisting** [2] - 80:23,  
93:7  
**associate** [3] - 12:25,  
13:25, 16:11  
**ASSOCIATED** [1] -  
3:29  
**assume** [1] - 111:17  
**assuming** [1] - 113:22  
**assurance** [1] - 80:18  
**astonished** [1] -  
109:10  
**astonishing** [1] - 44:6  
**AT** [1] - 116:8  
**attach** [1] - 56:18  
**attached** [10] - 8:10,  
9:20, 24:14, 28:23,  
28:27, 33:25, 66:1,  
70:19, 70:21, 89:14  
**attaching** [1] - 40:8  
**attachments** [1] -  
29:27  
**attempt** [3] - 38:21,  
108:6, 108:8  
**attempts** [2] - 17:19,

18:3  
**attend** [4] - 34:20,  
 35:21, 62:1, 76:17  
**attendance** [2] -  
 34:18, 34:25  
**attention** [7] - 31:18,  
 32:18, 37:24, 40:17,  
 43:19, 48:1, 105:12  
**attention'** [1] - 31:23  
**attested** [1] - 24:22  
**Audit** [1] - 6:24  
**audit** [1] - 80:21  
**audits** [1] - 80:17  
**August** [7] - 9:9, 25:5,  
 25:20, 79:27, 95:23,  
 112:10, 112:20  
**authority** [2] - 29:20,  
 30:4  
**automatic** [1] - 42:12  
**autonomy** [1] - 29:21  
**available** [6] - 40:5,  
 54:7, 54:14, 89:24,  
 99:26, 105:1  
**avoidance** [1] - 64:29  
**await** [4] - 80:12,  
 83:15, 112:12,  
 112:22  
**awaiting** [4] - 80:8,  
 80:19, 80:21, 80:28  
**aware** [24] - 14:14,  
 14:24, 21:29, 22:18,  
 33:29, 34:1, 34:3,  
 37:20, 42:9, 46:14,  
 46:26, 56:10, 59:6,  
 59:13, 59:16, 59:18,  
 74:21, 77:7, 88:14,  
 90:15, 104:29,  
 106:10, 108:18,  
 111:8  
**awareness** [1] - 69:25

## B

**background** [1] -  
 20:23  
**backlog** [8] - 50:7,  
 50:14, 51:8, 51:27,  
 52:1, 53:22, 54:20,  
 59:8  
**Baillieboro** [1] - 34:18  
**balance** [1] - 92:7  
**Bannon** [7] - 47:2,  
 47:19, 47:29, 63:1,  
 64:3, 64:8, 64:12  
**BANNON** [2] - 5:19,  
 64:5  
**Barr** [9] - 56:17, 56:18,  
 57:12, 57:16, 58:6,  
 74:15, 102:18,

109:22, 114:4  
**based** [6] - 24:15,  
 35:14, 49:16, 50:3,  
 71:4, 101:28  
**Basic** [1] - 6:22  
**Basic/Advanced** [1] -  
 6:24  
**basis** [12] - 13:29,  
 18:25, 30:20, 42:27,  
 88:17, 93:18, 98:2,  
 99:21, 99:26,  
 113:26, 113:29,  
 115:5  
**BAXTER** [1] - 3:25  
**became** [5] - 14:14,  
 36:10, 46:14, 46:26,  
 49:7  
**become** [1] - 51:29  
**becomes** [1] - 77:7  
**BEEN** [6] - 6:10, 24:8,  
 45:27, 48:19, 64:5,  
 70:14  
**beg** [1] - 75:19  
**beginning** [2] - 72:23,  
 109:18  
**begun** [1] - 72:20  
**behalf** [5] - 28:10,  
 39:1, 47:25, 65:24,  
 110:14  
**bell** [2] - 43:15, 44:3  
**BELL** [1] - 3:17  
**belonged** [1] - 69:20  
**below** [3] - 47:29,  
 83:11, 92:17  
**beside** [1] - 27:18  
**best** [7] - 21:16, 39:12,  
 92:3, 96:4, 114:12,  
 114:13, 116:4  
**better** [7] - 33:24,  
 36:10, 38:17, 38:18,  
 39:11, 44:14, 53:25  
**between** [13] - 26:21,  
 44:10, 46:5, 54:21,  
 54:22, 61:9, 78:20,  
 78:29, 87:2, 87:29,  
 88:10, 88:23, 95:20  
**beyond** [1] - 114:24  
**BL** [13] - 2:7, 2:10,  
 2:15, 2:19, 2:27, 3:4,  
 3:9, 3:14, 3:17, 3:19,  
 3:25, 4:1, 4:6  
**blacken** [2] - 39:23,  
 41:10  
**board** [2] - 71:18, 73:5  
**boards** [1] - 90:27  
**body** [1] - 19:25  
**bold** [1] - 76:20  
**bothering** [1] - 18:19  
**bottom** [3] - 13:16,  
 17:22, 112:11

**breach** [16] - 8:11,  
 12:14, 12:16, 13:20,  
 13:22, 16:5, 17:2,  
 18:6, 18:20, 18:21,  
 20:3, 20:6, 20:11,  
 46:19, 46:23, 77:23  
**Breach** [1] - 8:29  
**break** [1] - 63:3  
**breakdown** [1] -  
 109:11  
**BREFFNI** [1] - 2:15  
**BRIAN** [1] - 3:1  
**briefly** [3] - 64:18,  
 72:10, 89:22  
**bring** [2] - 31:17, 78:5  
**bringing** [2] - 31:23,  
 43:19  
**Brophy** [4] - 21:24,  
 22:6, 109:18, 112:17  
**Brophy's** [1] - 22:23  
**brought** [4] - 32:17,  
 37:23, 42:24, 43:24  
**BUCKLEY** [1] - 2:10  
**building** [1] - 80:24  
**bunch** [1] - 53:18  
**bundle** [1] - 52:14  
**business** [6] - 47:2,  
 47:20, 80:24, 81:14,  
 104:23, 111:18  
**BY** [49] - 1:5, 1:8, 2:10,  
 2:16, 2:20, 2:23,  
 2:28, 3:5, 3:9, 3:15,  
 3:17, 3:20, 3:25, 4:2,  
 5:4, 5:5, 5:6, 5:8,  
 5:9, 5:10, 5:11, 5:12,  
 5:13, 5:15, 5:17,  
 5:18, 5:20, 5:22,  
 5:23, 5:24, 5:25,  
 6:11, 15:22, 21:1,  
 24:9, 31:4, 39:9,  
 41:29, 43:9, 45:3,  
 45:28, 48:20, 60:7,  
 64:6, 70:15, 105:22,  
 110:11, 115:12  
**BYRNE** [1] - 2:25

## C

**cabinet** [1] - 52:7  
**Caledonian** [1] - 48:24  
**Callinan** [2] - 30:19,  
 30:24  
**campaign** [1] - 39:20  
**cannot** [1] - 87:29  
**CAOIMHE** [1] - 3:17  
**capable** [1] - 52:17  
**capacity** [1] - 30:21  
**Care** [1] - 93:2  
**care** [12] - 46:1, 48:27,  
 49:2, 49:9, 49:12,  
 64:16, 64:28, 73:3,  
 73:19, 73:21, 91:7,  
 91:8  
**career** [1] - 24:19  
**carried** [1] - 98:23  
**carry** [6] - 6:6, 71:28,  
 75:10, 75:13, 92:28,  
 113:8  
**CARTHAGE** [1] - 3:9  
**case** [30] - 32:9,  
 41:12, 43:18, 56:1,  
 59:12, 60:19, 74:7,  
 74:10, 74:15, 80:21,  
 84:19, 85:16, 85:25,  
 86:1, 86:12, 86:23,  
 86:28, 87:12, 87:25,  
 88:3, 89:4, 95:4,  
 100:9, 105:27,  
 109:11, 110:3,  
 110:7, 113:23,  
 114:26, 114:29  
**case"** [1] - 101:15  
**cases** [25] - 50:7,  
 50:15, 50:19, 50:23,  
 51:8, 51:24, 52:6,  
 52:9, 59:9, 74:14,  
 75:2, 78:3, 80:8,  
 80:10, 80:11, 80:19,  
 80:23, 80:24, 80:28,  
 83:2, 88:7, 88:14,  
 96:4, 99:18, 104:14  
**CASTLE** [1] - 1:17  
**Castleblayney** [4] -  
 49:3, 49:8, 49:16,  
 50:3  
**categories** [1] - 90:22  
**Catherine** [1] - 111:4  
**caused** [3] - 101:26,  
 102:25, 103:21  
**causing** [1] - 114:11  
**Cavan** [19] - 9:1, 10:8,  
 10:9, 10:21, 34:17,  
 34:23, 43:28, 46:2,  
 49:11, 49:20, 49:22,  
 49:23, 49:29, 54:7,  
 55:3, 55:4, 55:23,  
 69:22  
**Cavan-Monaghan** [5]  
 - 34:17, 34:23,  
 43:28, 46:2, 49:11  
**centre** [6] - 47:8, 49:9,  
 49:10, 50:8, 50:15,  
 50:22  
**Centre** [2] - 49:8,  
 49:29  
**certain** [5] - 26:14,  
 41:11, 61:6, 77:17,  
 110:15  
**CERTAIN** [1] - 1:4

**certainly** [25] - 11:5,  
 15:12, 23:21, 24:20,  
 28:25, 29:2, 29:19,  
 29:20, 29:28, 30:16,  
 30:18, 30:29, 31:13,  
 32:5, 33:29, 39:2,  
 39:19, 39:22, 39:25,  
 45:16, 57:22, 82:24,  
 103:18, 106:28,  
 109:2  
**certify** [1] - 1:25  
**CHAIRMAN** [31] - 6:4,  
 15:19, 15:26, 23:21,  
 23:26, 24:1, 38:2,  
 38:5, 38:9, 38:14,  
 38:19, 40:28, 41:25,  
 43:11, 44:3, 44:8,  
 44:20, 44:23, 44:26,  
 44:29, 45:19, 48:11,  
 56:23, 56:26, 57:1,  
 57:4, 62:21, 62:23,  
 63:3, 115:21, 115:29  
**Chairman** [30] - 6:7,  
 20:27, 20:28, 23:25,  
 23:29, 25:15, 26:18,  
 27:6, 28:6, 29:9,  
 30:29, 34:25, 36:6,  
 38:13, 38:18, 39:7,  
 39:13, 40:1, 40:19,  
 40:23, 41:16, 43:7,  
 44:22, 44:25, 44:27,  
 45:20, 57:3, 62:20,  
 70:7, 115:26  
**Chairman's** [1] - 45:7  
**challenges** [2] - 80:8,  
 89:27  
**CHAMBERS** [1] - 3:10  
**change** [2] - 72:11,  
 90:29  
**change-over** [1] -  
 72:11  
**changed** [1] - 69:9  
**changes** [1] - 71:12  
**changing** [1] - 69:7  
**chapter** [4] - 79:4,  
 79:7, 81:24, 82:26  
**character** [1] - 33:6  
**charge** [1] - 35:13  
**CHARLETON** [2] -  
 1:12, 2:2  
**check** [4] - 16:24,  
 54:25, 100:12,  
 113:13  
**checked** [2] - 17:12,  
 55:18  
**checking** [1] - 114:20  
**checks** [3] - 84:29,  
 113:14  
**CHIEF** [1] - 2:20  
**chief** [9] - 19:19,

26:10, 26:22, 34:23, 35:23, 43:28, 71:7, 107:2, 115:17

**Chief** [9] - 27:29, 28:15, 29:15, 30:5, 30:13, 33:25, 34:11, 34:16, 43:26

**Child** [27] - 9:8, 22:4, 49:7, 49:29, 70:26, 71:22, 72:2, 72:6, 72:14, 72:16, 72:29, 73:13, 73:25, 75:4, 75:28, 79:19, 79:25, 91:6, 91:12, 91:23, 92:10, 92:19, 93:2, 94:8, 95:1, 99:17, 104:28

**child** [56] - 10:21, 11:28, 21:21, 21:26, 23:1, 23:18, 33:7, 50:22, 56:13, 70:22, 71:15, 72:17, 73:3, 76:23, 77:16, 77:19, 77:23, 78:4, 78:26, 79:2, 79:13, 79:18, 80:3, 81:7, 81:8, 81:9, 81:18, 81:25, 82:9, 83:7, 83:16, 85:13, 85:15, 85:16, 85:25, 85:27, 85:28, 88:15, 88:19, 89:20, 91:7, 91:9, 91:13, 91:16, 91:21, 91:25, 92:4, 92:5, 93:12, 93:19, 94:9, 98:8, 106:1

**child's** [1] - 91:17

**childhood** [1] - 76:16

**children** [39] - 49:11, 50:16, 56:12, 72:4, 72:19, 72:22, 72:25, 72:28, 73:9, 73:17, 73:19, 73:27, 74:2, 74:4, 74:8, 74:13, 74:22, 74:26, 75:1, 75:29, 76:5, 78:21, 78:23, 79:1, 81:4, 81:17, 82:1, 86:3, 91:7, 92:2, 92:3, 93:4, 97:7, 97:8, 97:22, 98:1, 111:26

**Children** [7] - 75:14, 75:16, 75:18, 75:27, 76:2, 96:6, 111:22

**Children's** [14] - 70:20, 76:7, 77:28, 78:18, 82:27, 89:15, 89:23, 90:25, 94:6, 94:12, 94:20, 95:7, 98:15, 108:23

**CHO** [1] - 64:17

**choose** [2] - 50:22, 52:6

**choosing** [3] - 52:9, 58:4, 58:24

**Christmas** [1] - 24:26

**chronologies** [1] - 82:8

**circulated** [1] - 69:26

**circulation** [1] - 68:2

**circumstances** [2] - 33:3, 73:19

**civilian** [1] - 26:5

**clarified** [1] - 74:11

**clarify** [6] - 89:10, 95:13, 95:16, 95:27, 114:9, 115:4

**clarifying** [2] - 80:22, 96:8

**clarity** [2] - 82:17, 107:3

**clear** [8] - 27:24, 36:15, 59:23, 60:17, 83:29, 97:9, 109:13, 110:3

**clearly** [4] - 16:18, 18:18, 37:28, 82:20

**clerk** [3] - 32:17, 32:28, 38:25

**clerks** [2] - 35:22, 35:23

**client** [12] - 9:6, 9:8, 9:10, 9:18, 10:5, 10:22, 13:29, 21:12, 66:21, 66:27, 67:9, 69:11

**clients** [4] - 12:13, 54:9, 61:26, 61:29

**clinical** [2] - 64:23, 64:28

**CLIONA** [1] - 3:16

**close** [2] - 45:12, 99:11

**closed** [2] - 45:17, 114:1

**collaboration** [1] - 95:20

**collaborative** [2] - 54:28, 61:5

**collaboratively** [2] - 52:5, 96:7

**colleague** [1] - 107:2

**College** [2] - 24:21, 71:17

**coming** [4] - 25:26, 32:1, 38:6, 89:4

**commence** [1] - 87:17

**commenced** [1] - 40:22

**comment** [2] - 23:22, 40:29

**comments** [1] - 47:29

**commissioner** [18] - 23:15, 25:27, 29:11, 29:17, 29:23, 30:24, 31:8, 31:27, 31:29, 34:13, 38:12, 42:3, 42:5, 43:4, 43:20, 43:27, 44:1, 44:13

**Commissioner** [42] - 21:6, 25:17, 25:21, 26:8, 26:28, 27:15, 28:8, 28:19, 29:29, 30:1, 30:10, 30:19, 30:20, 30:22, 30:23, 30:24, 30:27, 30:28, 31:18, 32:11, 32:14, 32:15, 32:20, 32:27, 32:29, 33:13, 33:28, 34:21, 35:11, 36:2, 36:15, 36:21, 37:12, 38:23, 38:26, 39:27, 40:10, 42:17, 42:18, 44:19, 45:8, 110:15

**COMMISSIONER** [1] - 2:18

**Commissioner's** [20] - 26:24, 28:4, 28:10, 28:12, 28:18, 29:5, 29:13, 29:16, 29:22, 30:6, 32:6, 32:21, 32:24, 33:4, 33:10, 33:14, 37:15, 37:17, 38:22, 39:4

**commissioner's** [22] - 24:14, 25:1, 25:4, 25:6, 25:9, 25:13, 25:23, 26:3, 26:4, 26:22, 26:23, 27:11, 27:19, 27:20, 27:22, 30:3, 37:24, 37:27, 42:13, 42:15, 43:23, 44:14

**committed** [3] - 33:5, 78:7, 78:29

**common** [1] - 41:12

**communicate** [2] - 34:21, 91:25

**communicated** [1] - 34:19

**communication** [5] - 7:23, 13:28, 16:14, 19:6, 95:20

**community** [2] - 46:11, 78:5

**COMPANY** [2] - 2:16, 3:26

**complainant** [19] - 96:16, 96:23, 96:25, 97:1, 97:9, 98:14, 98:20, 98:22, 99:2, 99:9, 99:12, 99:15, 102:4, 102:5, 114:7, 114:14, 114:18, 114:22, 115:4

**complainant\*** [1] - 96:11

**complaint** [3] - 7:5, 54:16, 112:18

**complaints** [3] - 7:5, 65:3, 112:29

**complete** [4] - 106:24, 107:17, 108:1, 109:24

**completed** [5] - 6:17, 66:2, 66:10, 115:14, 115:25

**completely** [2] - 43:17, 111:13

**completion** [1] - 87:17

**compliance** [11] - 105:5, 106:29, 107:8, 107:11, 107:12, 107:21, 107:23, 108:23, 108:24, 109:3, 109:14

**complied** [1] - 108:12

**comply** [7] - 20:3, 96:5, 106:24, 107:17, 108:1, 108:9, 109:25

**composed** [1] - 57:2

**composing** [1] - 58:3

**compromised** [1] - 99:5

**computers** [1] - 105:3

**concern** [10] - 20:6, 20:9, 50:6, 56:2, 58:13, 80:29, 86:2, 93:18, 93:22, 93:26

**concerned** [17] - 13:23, 14:1, 14:25, 16:10, 17:21, 17:23, 19:24, 20:13, 21:12, 23:15, 31:28, 40:6, 40:25, 77:18, 88:19, 108:29, 109:15

**concerns** [10] - 56:15, 79:14, 79:18, 80:4, 81:4, 81:25, 82:4, 88:14, 101:19, 114:8

**concluded** [7] - 104:5, 104:15, 111:13, 111:16, 111:18, 113:25, 115:19

**concludes** [1] - 9:15

**conclusion** [11] - 12:10, 16:27, 91:24, 92:22, 99:20, 99:21, 99:22, 101:27, 104:13, 104:14, 113:28

**conduct** [2] - 104:23, 113:2

**conducted** [1] - 106:7

**conducting** [1] - 59:20

**conference** [1] - 30:22

**conferences** [1] - 81:7

**confessing** [1] - 63:4

**confident** [1] - 56:16

**confidential** [9] - 8:28, 25:27, 30:9, 31:11, 31:13, 31:15, 43:3, 77:18, 103:11

**confidentiality** [5] - 14:27, 14:29, 15:4, 77:10, 77:24

**confidentially** [1] - 27:17

**confirm** [6] - 13:21, 14:23, 21:7, 95:3, 98:21, 103:24

**confirmation** [2] - 12:5, 83:15

**confirmed** [1] - 90:28

**CONLON** [1] - 3:9

**connected** [2] - 45:7, 59:28

**Connolly** [1] - 109:19

**CONOR** [1] - 2:19

**consider** [2] - 97:29, 113:20

**consideration** [6] - 12:23, 14:27, 91:10, 91:18, 92:20, 101:22

**considered** [6] - 9:21, 9:24, 12:24, 20:17, 23:8, 23:15

**considering** [2] - 89:23, 92:22

**conspiracy** [3] - 39:17, 39:23, 41:10

**conspire** [1] - 40:26

**constantly** [1] - 88:25

**consult** [5] - 84:4, 84:13, 84:29, 87:24, 88:16

**consultancy** [1] - 8:21

**consultants** [1] - 46:11

**consultation** [2] - 17:7, 88:9

**consultations** [1] - 82:5

**consulted** [1] - 59:6

**consulting** [2] - 83:13, 84:15

**consumer** [2] - 6:14, 7:2



**contact** [17] - 9:26, 12:4, 12:15, 17:20, 17:29, 61:29, 76:23, 84:26, 87:10, 87:16, 87:29, 88:17, 89:10, 94:26, 96:23, 100:10, 111:4  
**contacted** [2] - 7:12, 112:4  
**contacting** [3] - 37:5, 96:11, 96:25  
**contacts** [1] - 82:5  
**contain** [1] - 102:11  
**contained** [12] - 9:6, 9:17, 11:6, 30:12, 37:18, 37:27, 75:23, 82:26, 90:15, 95:7, 102:26, 108:27  
**contains** [2] - 23:6, 67:13  
**contemporaneous** [1] - 82:3  
**content** [1] - 31:9  
**contents** [2] - 102:10, 102:15  
**context** [6] - 72:19, 77:16, 80:6, 97:19, 97:22, 109:16  
**continual** [1] - 80:26  
**CONTINUED** [1] - 64:1  
**continued** [1] - 67:10  
**continues** [1] - 80:28  
**control** [2] - 17:8, 17:9  
**controller** [2] - 17:5  
**controllers** [1] - 17:7  
**convened** [1] - 34:26  
**conversation** [3] - 14:20, 31:21, 70:2  
**conversations** [4] - 14:24, 17:11, 18:17, 20:16  
**conveying** [1] - 39:14  
**cooperation** [4] - 78:20, 81:11, 88:23, 92:1  
**coordination** [1] - 72:28  
**copied** [2] - 46:17, 61:23  
**copies** [1] - 12:4  
**copy** [10] - 10:22, 11:10, 12:5, 36:7, 36:11, 67:15, 68:15, 69:11, 85:15, 104:2  
**CORMAC** [2] - 5:21, 70:14  
**Cormac** [1] - 70:11  
**correct** [173] - 6:15, 6:16, 6:25, 6:26, 6:29, 7:3, 7:16, 7:28,

7:29, 8:4, 9:22, 9:23, 9:28, 11:12, 16:20, 17:15, 21:17, 24:17, 25:14, 25:15, 26:15, 26:16, 27:5, 27:6, 28:5, 28:6, 35:28, 36:3, 36:6, 38:13, 38:22, 40:1, 44:22, 46:4, 46:8, 46:18, 46:21, 46:25, 46:29, 47:5, 47:10, 47:22, 47:26, 48:4, 48:7, 48:25, 49:5, 51:4, 55:20, 58:4, 61:1, 64:13, 64:14, 65:3, 65:4, 65:8, 65:9, 65:13, 65:14, 65:17, 65:18, 65:24, 65:25, 65:27, 65:28, 65:29, 66:4, 66:5, 66:11, 66:12, 66:14, 66:15, 66:25, 66:29, 68:6, 68:16, 68:18, 68:20, 68:25, 69:1, 69:16, 70:27, 70:28, 71:19, 71:20, 71:24, 71:25, 71:29, 72:1, 72:4, 72:5, 72:9, 73:11, 73:12, 73:23, 73:24, 73:29, 74:9, 74:17, 74:19, 75:5, 75:6, 75:8, 75:9, 75:17, 75:22, 76:1, 76:9, 76:11, 76:27, 76:28, 77:25, 78:12, 78:13, 78:16, 78:17, 79:9, 81:12, 81:13, 82:7, 84:14, 84:17, 87:15, 87:20, 87:21, 87:26, 88:5, 88:7, 88:8, 88:10, 88:11, 89:15, 89:16, 92:25, 92:26, 92:29, 93:12, 93:26, 93:27, 94:2, 94:3, 94:15, 94:16, 95:25, 98:26, 99:8, 99:13, 99:14, 99:29, 100:17, 101:3, 101:4, 101:7, 101:8, 102:12, 102:13, 102:14, 102:29, 103:3, 103:4, 103:5, 103:12, 103:13, 104:16, 105:25, 105:28, 106:16, 112:7, 112:14, 112:24, 114:15, 115:9  
**corrected** [7] - 10:23, 19:26, 66:22, 66:29, 67:5, 67:15, 68:5

**correctly** [4] - 14:16, 52:4, 67:28, 109:6  
**correctness** [1] - 36:17  
**correspondence** [34] - 14:2, 25:25, 25:26, 26:15, 26:20, 26:21, 26:26, 27:3, 27:7, 27:12, 27:14, 27:25, 28:6, 28:16, 28:20, 28:23, 29:15, 29:24, 29:26, 31:11, 31:16, 31:22, 32:1, 32:17, 32:29, 33:20, 34:10, 34:12, 37:23, 42:29, 43:13, 43:14, 43:24, 103:9  
**COSTELLO** [1] - 2:16  
**counsel** [3] - 15:25, 21:5, 41:7  
**Counseling** [8] - 8:28, 11:25, 13:20, 14:5, 14:8, 14:28, 68:12, 68:19  
**counselling** [7] - 9:1, 10:7, 66:3, 69:20, 76:18, 77:12, 77:13  
**counsellor** [9] - 9:11, 11:6, 14:14, 66:21, 67:1, 69:11, 76:26, 77:3, 100:29  
**counsellor's** [1] - 67:19  
**counsellor-therapist** [1] - 9:11  
**counsellors** [1] - 66:10  
**counties** [2] - 50:4, 52:3  
**county** [2] - 54:22, 54:24  
**County** [1] - 48:27  
**couple** [2] - 15:20, 35:12  
**course** [7] - 14:23, 35:6, 53:28, 54:10, 104:16, 106:12, 113:9  
**courses** [1] - 6:17  
**Court** [1] - 12:8  
**COURT** [4] - 1:13, 2:3, 5:12, 43:9  
**court** [9] - 13:5, 13:7, 18:29, 19:2, 19:4, 19:8, 19:20, 20:5, 20:6  
**cover** [2] - 8:21, 81:5  
**coverage** [3] - 56:4, 59:12, 59:13  
**covers** [1] - 49:29

**COX** [1] - 2:28  
**create** [1] - 98:7  
**created** [6] - 37:28, 54:18, 58:15, 110:19, 112:9, 113:10  
**creates** [4] - 76:2, 77:5, 77:6, 112:19  
**credibility** [1] - 112:29  
**crime** [3] - 32:2, 78:7, 78:28  
**crimes** [2] - 33:5, 78:15  
**criminal** [8] - 19:20, 19:21, 32:7, 78:8, 78:11, 95:15, 95:16, 112:2  
**criminality** [1] - 32:4  
**criteria** [1] - 52:28  
**critical** [2] - 28:14, 81:28  
**CROSS** [16] - 5:5, 5:6, 5:9, 5:10, 5:13, 5:18, 5:23, 5:24, 15:22, 21:1, 31:4, 39:9, 45:3, 60:7, 105:22, 110:11  
**cross** [1] - 18:14  
**CROSS-EXAMINED** [16] - 5:5, 5:6, 5:9, 5:10, 5:13, 5:18, 5:23, 5:24, 15:22, 21:1, 31:4, 39:9, 45:3, 60:7, 105:22, 110:11  
**CSA** [1] - 110:28  
**current** [6] - 30:20, 30:28, 76:23, 82:19, 103:7, 105:1  
**curtailed** [1] - 82:2  
**CUSH** [2] - 2:23, 20:27

---

## D

---

**damage** [2] - 21:9, 21:12  
**danger** [1] - 20:10  
**DARREN** [1] - 3:14  
**Data** [1] - 6:23  
**data** [29] - 7:6, 8:11, 8:29, 12:14, 12:17, 12:25, 12:27, 13:19, 13:22, 13:26, 16:4, 16:12, 17:2, 17:4, 17:5, 17:8, 18:6, 18:21, 20:1, 20:2, 20:4, 20:6, 20:11, 46:19, 46:23, 77:24, 109:1

**date** [22] - 7:2, 7:3, 7:4, 8:12, 19:29, 24:19, 54:1, 54:14, 55:23, 56:18, 56:23, 56:27, 57:9, 57:14, 61:4, 61:25, 62:1, 75:15, 75:16, 102:14, 103:5, 115:18  
**dated** [9] - 8:7, 8:29, 22:26, 23:3, 43:25, 55:16, 64:9, 89:21, 90:13  
**dates** [1] - 74:18  
**DAVID** [1] - 3:8  
**DAY** [1] - 1:18  
**day-to-day** [2] - 25:25, 25:29  
**days** [8] - 35:12, 51:27, 52:2, 54:10, 54:20, 58:13, 62:3  
**deal** [14] - 17:2, 25:28, 27:27, 29:12, 34:26, 41:8, 43:4, 44:1, 45:8, 53:8, 100:2, 108:29, 110:7, 111:6  
**dealing** [12] - 6:14, 17:1, 17:4, 25:25, 25:27, 33:2, 41:18, 44:13, 58:27, 87:12, 100:1, 114:19  
**dealings** [2] - 26:9, 48:5  
**deals** [3] - 76:8, 77:26, 83:20  
**deal** [4] - 8:17, 29:24, 37:24, 113:28  
**dear** [2] - 8:10, 55:27  
**decided** [7] - 23:14, 34:13, 42:9, 100:2, 100:3, 100:9, 111:17  
**decision** [4] - 42:19, 45:11, 74:20, 111:13  
**Decisionmaker** [1] - 6:22  
**decisions** [1] - 75:7  
**deemed** [1] - 33:8  
**Deeney** [15] - 51:6, 51:17, 52:20, 53:4, 53:10, 53:16, 54:8, 54:13, 54:29, 55:9, 55:13, 59:10, 60:13, 100:3, 100:7  
**deficit** [1] - 80:25  
**deficits** [3] - 80:12, 80:14, 107:22  
**defined** [3] - 90:7, 90:20, 90:24  
**definite** [1] - 89:7  
**definitely** [3] - 17:14,

41:7, 109:7  
**degree** [1] - 48:23  
**delay** [3] - 58:27, 58:29, 87:11  
**delays** [1] - 59:7  
**demands** [1] - 40:6  
**department** [1] - 71:5  
**Department** [1] - 13:12  
**depth** [1] - 33:28  
**DERMOT** [2] - 5:14, 45:27  
**Dermot** [3] - 45:24, 66:15, 70:2  
**describe** [2] - 53:25, 57:11  
**described** [1] - 79:3  
**description** [3] - 9:14, 16:21, 16:22  
**designated** [14] - 81:5, 85:11, 86:11, 86:13, 86:23, 86:24, 86:25, 87:10, 87:11, 87:16, 87:23, 87:25, 88:1, 88:3  
**desk** [4] - 18:14, 27:18, 27:19, 27:24  
**destroyed** [1] - 67:15  
**destruction** [1] - 11:23  
**detail** [11] - 13:21, 14:2, 18:10, 79:3, 97:23, 97:26, 101:9, 103:1, 103:28, 107:14, 107:16  
**detailed** [2] - 20:19, 104:3  
**details** [6] - 10:3, 67:26, 82:5, 87:13, 96:9, 98:23  
**determination** [8] - 84:10, 84:22, 90:4, 90:7, 90:21, 92:6, 97:12, 99:23  
**determine** [6] - 91:12, 97:7, 100:13, 100:28, 101:14, 101:23  
**determining** [3] - 84:28, 90:1, 90:11  
**developed** [1] - 81:17  
**developing** [1] - 49:9  
**development** [4] - 6:19, 71:3, 71:9, 73:16  
**DIARMAID** [1] - 2:6  
**diary** [3] - 25:28, 55:18, 57:8  
**dictaphone** [1] - 33:17  
**dictate** [2] - 33:14, 33:17  
**difference** [1] - 44:9  
**different** [14] - 6:28, 23:28, 32:1, 36:22, 43:18, 78:24, 84:17, 90:28, 107:18, 109:7, 109:20, 111:24, 112:1  
**difficulty** [2] - 18:29, 28:17  
**digital** [1] - 43:17  
**DIGNAM** [1] - 2:19  
**direct** [4] - 31:25, 43:21, 50:9, 87:10  
**directed** [8] - 26:14, 29:17, 29:22, 38:27, 41:21, 49:19, 56:11, 105:27  
**directing** [1] - 24:25  
**direction** [4] - 29:28, 51:10, 51:12, 78:8  
**directions** [3] - 26:17, 26:25, 26:27  
**DIRECTLY** [12] - 5:4, 5:8, 5:15, 5:17, 5:20, 5:22, 6:11, 24:8, 45:27, 48:19, 64:5, 70:14  
**directly** [4] - 31:29, 49:10, 52:21, 114:15  
**Director** [1] - 70:26  
**director** [9] - 7:25, 71:2, 72:22, 72:24, 79:24, 79:28, 82:15, 106:9, 108:16  
**directorate** [2] - 64:28, 72:21  
**disability** [3] - 64:16, 64:21, 64:23  
**discharge** [1] - 64:28  
**discipline** [2] - 32:3, 32:8  
**disclosing** [1] - 76:15  
**disclosure** [3] - 21:28, 76:8, 77:4  
**disclosures** [2] - 76:17, 76:24  
**DISCLOSURES** [2] - 1:3, 1:4  
**discrepancy** [1] - 100:11  
**discuss** [12] - 12:15, 12:28, 27:7, 30:12, 30:26, 34:29, 56:1, 58:9, 61:14, 103:22, 103:26, 104:20  
**discussed** [3] - 53:3, 61:13, 100:9  
**discussing** [2] - 37:4, 69:28  
**discussion** [7] - 31:8, 31:19, 37:10, 52:27, 53:9, 58:18, 61:9  
**displayed** [1] - 11:3  
**disposal** [1] - 14:10  
**disseminate** [2] - 15:13, 15:14  
**district** [1] - 35:23  
**divert** [2] - 50:19, 61:19  
**division** [1] - 34:17  
**divisional** [1] - 35:22  
**DNE** [1] - 8:28  
**document** [40] - 21:11, 21:23, 21:29, 22:6, 22:27, 22:28, 23:4, 23:7, 23:10, 23:16, 28:27, 70:21, 75:23, 75:25, 81:16, 81:21, 89:18, 89:22, 90:13, 90:16, 90:21, 90:26, 91:1, 92:25, 92:27, 93:10, 94:23, 95:9, 95:19, 95:29, 101:24, 102:23, 107:26, 110:17, 110:21, 110:22, 110:23, 112:10, 112:11, 112:23  
**documentation** [2] - 32:22, 75:24  
**documents** [13] - 16:25, 20:22, 21:28, 22:10, 33:25, 37:14, 37:27, 55:15, 70:19, 71:28, 75:11, 104:27, 106:5  
**DONAL** [11] - 2:19, 5:6, 5:24, 20:28, 21:1, 21:4, 23:25, 23:29, 70:7, 110:11, 110:13  
**Donal** [2] - 21:4, 110:13  
**DONALD** [1] - 2:20  
**done** [17] - 19:8, 22:19, 45:17, 52:14, 57:27, 80:18, 80:21, 92:12, 98:17, 99:11, 108:15, 110:25, 111:15, 111:19, 111:21, 112:21, 113:22  
**Donegal** [1] - 46:2  
**door** [1] - 99:11  
**down** [7] - 6:13, 19:14, 36:27, 39:18, 45:12, 45:17, 55:4  
**down-play** [1] - 36:27  
**DPP** [4] - 56:11, 111:1, 111:14, 111:17  
**draft** [9] - 33:24, 56:18, 56:22, 56:24, 56:25, 57:2, 58:6, 102:26, 115:16  
**drafted** [2] - 34:22, 67:12  
**drafting** [1] - 25:26  
**draw** [1] - 105:12  
**drop** [1] - 44:4  
**DUBLIN** [10] - 1:17, 2:13, 2:17, 2:22, 2:26, 2:29, 3:2, 3:11, 3:21, 4:4  
**Dublin** [9] - 6:15, 7:8, 7:9, 26:24, 29:5, 30:6, 49:13, 49:14, 71:17  
**due** [5] - 40:5, 56:4, 59:12, 61:26, 80:12  
**DUFFY** [7] - 5:7, 24:8, 31:4, 39:9, 41:29, 43:9, 45:3  
**Duffy** [6] - 24:6, 24:13, 27:28, 29:5, 31:6, 38:2  
**Duffy's** [2] - 24:11, 37:1  
**duly** [5] - 26:28, 28:9, 28:11, 29:26, 32:20  
**DUNNE** [1] - 3:19  
**during** [6] - 14:19, 53:28, 76:16, 104:9, 106:12, 110:28  
**dusted** [1] - 45:17  
**duties** [6] - 25:18, 25:23, 25:24, 26:7, 29:15, 73:27  
**duty** [7] - 25:1, 55:3, 91:12, 91:25, 92:10, 112:12, 112:21  
**DÁIL** [1] - 1:5

---

**E**

---

**e.g** [2] - 100:29, 101:13  
**EAMON** [1] - 3:4  
**EARL** [1] - 3:27  
**earliest** [1] - 102:10  
**EARLSFORT** [2] - 2:28, 3:21  
**early** [1] - 59:5  
**Eastern** [1] - 35:13  
**effect** [4] - 16:3, 16:16, 95:24, 95:29  
**effective** [7] - 73:18, 82:21, 85:2, 85:3, 95:19, 110:1, 110:4  
**effectively** [4] - 41:1, 43:20, 111:19, 112:5  
**effort** [1] - 61:5  
**efforts** [2] - 18:3, 80:26  
**eight** [1] - 56:16  
**either** [10] - 27:17, 30:25, 30:27, 41:9, 52:20, 53:4, 54:8, 58:23, 62:1, 85:27  
**elaborate** [1] - 17:10  
**element** [1] - 108:9  
**elements** [6] - 97:18, 107:12, 107:13, 107:21, 107:23, 109:3  
**eligibility** [1] - 84:22  
**ELIZABETH** [1] - 2:7  
**ELY** [1] - 3:2  
**email** [32] - 7:13, 8:6, 9:21, 9:23, 12:9, 13:19, 18:4, 28:4, 28:16, 28:17, 28:20, 28:22, 28:26, 32:10, 46:16, 47:7, 47:25, 55:12, 55:14, 55:16, 55:25, 59:11, 60:11, 60:16, 61:23, 62:8, 65:10, 65:16, 65:19, 65:23, 66:1, 70:2  
**emailing** [2] - 14:17, 14:18  
**emerged** [1] - 113:11  
**emphasised** [1] - 75:4  
**emphasises** [1] - 77:10  
**employed** [1] - 89:6  
**employee** [1] - 64:12  
**employers** [1] - 7:13  
**employment** [3] - 6:18, 6:20, 49:2  
**enable** [1] - 91:27  
**enclosing** [1] - 66:29  
**encompass** [1] - 8:22  
**encompasses** [1] - 7:4  
**encourage** [1] - 73:17  
**encouraged** [2] - 88:18, 88:24  
**end** [9] - 13:7, 18:14, 18:15, 49:7, 53:24, 72:24, 110:23, 113:24, 113:25  
**ended** [2] - 40:22, 41:14  
**ending** [1] - 20:6  
**engage** [4] - 98:28, 99:10, 99:15, 104:7  
**engaging** [4] - 53:9, 88:25, 99:11, 102:6

**ensure** [10] - 12:3,  
12:26, 21:9, 47:15,  
68:26, 69:7, 88:24,  
91:20, 92:10, 95:19  
**ensuring** [1] - 109:29  
**enter** [1] - 20:12  
**entire** [1] - 72:29  
**entirely** [2] - 43:18,  
49:16  
**environment** [1] -  
77:13  
**envisage** [1] - 99:16  
**envisaged** [1] - 57:12  
**epicentre** [2] - 39:23,  
41:10  
**EQUALITY** [1] - 1:9  
**error** [9] - 9:9, 10:25,  
13:24, 16:10, 29:6,  
66:29, 67:3, 67:6,  
68:7  
**errors** [2] - 109:5,  
110:3  
**essence** [1] - 100:16  
**essential** [3] - 76:22,  
82:2, 114:4  
**essentially** [13] - 21:8,  
23:7, 66:20, 74:20,  
77:13, 88:6, 92:24,  
98:29, 110:23,  
110:25, 111:15,  
112:3, 112:15  
**establish** [5] - 72:20,  
76:22, 88:15, 89:2,  
89:6  
**ESTABLISHED** [1] -  
1:8  
**established** [6] -  
72:14, 72:26, 73:1,  
87:16, 87:29, 113:21  
**establishing** [1] -  
83:11  
**etcetera** [1] - 52:1  
**ethical** [1] - 76:3  
**Ethics** [1] - 6:25  
**ethics** [1] - 7:6  
**evening** [2] - 17:28,  
18:5  
**event** [1] - 114:2  
**events** [1] - 22:22  
**eventually** [1] - 13:1  
**EVIDENCE** [1] - 1:9  
**evidence** [16] - 9:28,  
26:9, 26:11, 29:8,  
29:11, 36:23, 41:6,  
46:16, 59:3, 59:23,  
105:26, 106:17,  
106:20, 108:5,  
108:19, 112:26  
**evident** [2] - 12:16,  
29:24

**exact** [1] - 83:27  
**exactly** [3] - 15:8,  
54:26, 67:26  
**examine** [2] - 84:9,  
84:24  
**EXAMINED** [32] - 5:4,  
5:5, 5:6, 5:8, 5:9,  
5:10, 5:11, 5:13,  
5:15, 5:17, 5:18,  
5:20, 5:22, 5:23,  
5:24, 5:25, 6:11,  
15:22, 21:1, 24:9,  
31:4, 39:9, 41:29,  
45:3, 45:28, 48:20,  
60:7, 64:6, 70:15,  
105:22, 110:11,  
115:12  
**examined** [2] - 13:20,  
80:21  
**example** [2] - 107:25,  
108:22  
**except** [1] - 35:6  
**execute** [1] - 73:26  
**executive** [1] - 71:7  
**Executive** [2] - 8:20,  
72:8  
**exist** [7] - 83:12,  
108:21, 108:22,  
108:24, 108:26,  
108:28, 109:1  
**existing** [2] - 33:11,  
93:18  
**exists** [4] - 14:29,  
92:27, 93:1, 105:29  
**expect** [9] - 79:24,  
83:25, 84:4, 86:5,  
86:16, 86:25, 97:16,  
104:25, 104:29  
**expected** [2] - 29:12,  
52:13  
**experience** [4] - 6:27,  
31:27, 33:2, 57:22  
**experienced** [1] - 9:7  
**explain** [8] - 25:22,  
49:25, 72:10, 89:22,  
95:8, 97:1, 97:11,  
99:4  
**explained** [2] - 14:2,  
99:9  
**expressed** [1] - 29:2  
**expression** [1] - 44:4  
**extensive** [2] - 6:27,  
18:25  
**extent** [3] - 37:8,  
49:28, 59:15  
**extreme** [1] - 18:2

## F

**facéd** [1] - 89:27  
**faces** [1] - 80:8  
**fact** [10] - 18:10, 19:9,  
19:25, 36:27, 44:20,  
51:29, 62:11,  
111:12, 113:17,  
114:28  
**facts** [1] - 107:8  
**factual** [1] - 109:17  
**failure** [6] - 106:24,  
107:4, 107:17,  
108:1, 109:10,  
109:24  
**failures** [3] - 106:28,  
108:20, 108:21  
**fair** [11] - 25:9, 74:24,  
77:4, 90:3, 90:11,  
92:13, 97:27, 98:5,  
104:22, 107:27,  
108:4  
**fairly** [1] - 25:8  
**falls** [1] - 88:21  
**false** [5] - 37:18,  
37:28, 38:6, 38:7  
**familiar** [14] - 22:14,  
25:8, 27:4, 28:29,  
29:1, 30:2, 51:18,  
51:20, 51:23, 57:16,  
57:17, 76:26,  
104:27, 106:14  
**families** [3] - 49:11,  
50:16, 73:18  
**family** [13] - 11:28,  
50:9, 53:5, 72:19,  
72:23, 72:25, 72:28,  
78:21, 78:23, 78:26,  
79:1, 92:1, 106:1  
**Family** [24] - 9:8, 22:4,  
70:27, 71:23, 72:3,  
72:6, 72:14, 72:16,  
73:1, 73:13, 73:25,  
75:4, 75:28, 79:19,  
79:25, 91:6, 91:12,  
91:23, 92:10, 92:19,  
94:8, 95:1, 99:17,  
104:28  
**FANNING** [3] - 2:11,  
4:1, 4:2  
**far** [1] - 20:13  
**fashion** [1] - 82:18  
**fear** [1] - 18:28  
**February** [2] - 42:24,  
46:5  
**FEBRUARY** [2] - 1:6,  
1:10  
**feedback** [1] - 8:13  
**felt** [1] - 13:2

**female** [1] - 56:12  
**FERRY** [1] - 3:9  
**few** [5] - 12:14, 22:21,  
54:11, 75:26, 110:16  
**file** [47] - 11:10, 11:19,  
16:25, 19:1, 23:26,  
27:14, 30:8, 36:5,  
36:14, 37:13, 37:20,  
38:23, 42:10, 42:17,  
42:21, 42:23, 44:13,  
44:14, 44:16, 52:22,  
55:21, 56:10, 58:24,  
59:18, 59:22, 59:29,  
60:18, 61:4, 61:11,  
61:15, 61:23, 67:10,  
68:14, 68:15, 78:11,  
83:24, 85:15, 106:8,  
108:15, 110:26,  
111:1, 113:19,  
113:21, 113:22,  
114:13, 115:14  
**files** [37] - 42:13,  
42:16, 42:27, 42:28,  
43:2, 52:1, 52:9,  
52:23, 52:24, 52:28,  
53:8, 53:13, 53:15,  
53:18, 53:23, 54:10,  
54:27, 55:28, 57:6,  
57:9, 58:14, 58:27,  
58:29, 59:20, 60:14,  
60:24, 60:26, 60:28,  
61:2, 61:6, 61:7,  
61:18, 82:18, 82:21,  
84:5, 84:16, 106:5  
**files"** [1] - 60:21  
**filing** [1] - 52:7  
**final** [3] - 92:21,  
101:27, 104:14  
**finalise** [1] - 98:19  
**finally** [1] - 87:27  
**financial** [1] - 6:20  
**finés** [1] - 24:26  
**finished** [1] - 102:9  
**FINTAN** [1] - 3:15  
**Fiona** [30] - 7:14, 8:7,  
8:22, 9:26, 12:15,  
13:7, 13:14, 14:11,  
14:16, 16:1, 16:3,  
16:17, 16:18, 16:26,  
16:28, 17:9, 17:12,  
17:20, 19:6, 19:10,  
19:16, 20:16, 20:18,  
22:17, 46:15, 47:11,  
47:25, 47:29, 66:2,  
68:26  
**FIONA** [1] - 3:25  
**first** [27] - 6:7, 9:3,  
11:15, 12:3, 12:12,  
14:16, 27:28, 39:15,  
52:2, 75:14, 75:27,  
79:12, 81:18, 93:15,  
94:5, 97:3, 98:20,  
98:22, 98:24, 98:28,  
99:10, 102:3, 102:5,  
113:4, 113:11,  
114:12, 115:3  
**First** [21] - 70:20,  
75:14, 75:16, 75:18,  
75:27, 76:2, 76:7,  
77:28, 78:18, 82:27,  
89:15, 89:23, 90:25,  
94:6, 94:12, 94:20,  
95:7, 96:6, 98:15,  
108:23, 111:22  
**five** [3] - 36:13, 108:7,  
108:11  
**focus** [2] - 78:25,  
78:27  
**follow** [13] - 18:5,  
18:9, 18:21, 18:22,  
18:26, 19:12, 19:14,  
26:24, 42:11, 83:26,  
94:19, 97:27, 108:6  
**follow-up** [3] - 18:5,  
19:12, 19:14  
**followed** [20] - 14:11,  
18:13, 26:17, 42:5,  
67:28, 79:20, 79:29,  
88:6, 90:6, 90:10,  
93:22, 93:28, 96:1,  
98:10, 100:4,  
106:13, 108:10,  
108:11, 110:1, 110:6  
**FOLLOWING** [1] - 1:5  
**following** [15] - 1:26,  
9:10, 11:16, 24:22,  
69:25, 72:15, 81:17,  
93:6, 98:18, 100:4,  
100:16, 100:24,  
101:2, 101:21, 109:6  
**FOLLOWS** [4] - 6:1,  
64:1, 64:6, 70:15  
**FOR** [17] - 1:8, 2:6,  
2:9, 2:14, 2:18, 2:23,  
2:27, 3:1, 3:4, 3:14,  
3:16, 3:19, 3:23,  
3:25, 4:1, 4:6, 63:7  
**force** [2] - 32:24, 34:6  
**form** [9] - 21:24, 29:7,  
78:10, 85:12, 85:14,  
85:17, 86:10, 86:19,  
114:4  
**Form** [1] - 87:18  
**formal** [6] - 29:7,  
88:16, 88:21, 88:28,  
89:1, 89:3  
**formally** [4] - 79:20,  
83:2, 83:9, 94:11  
**format** [1] - 109:20  
**formed** [1] - 11:9

**former** [3] - 30:19, 30:27, 39:27  
**forms** [2] - 79:2, 89:14  
**forward** [6] - 29:13, 29:15, 38:25, 71:11, 92:16, 112:8  
**forwarded** [10] - 10:20, 13:28, 16:14, 37:16, 54:2, 57:15, 62:8, 66:3, 100:11, 109:21  
**foundation** [1] - 100:14  
**founded** [2] - 90:21, 101:29  
**fourth** [1] - 10:17  
**Frank** [1] - 28:13  
**Freedom** [5] - 6:21, 6:22, 7:5, 65:1  
**Freeflow'** [1] - 24:24  
**FREEMAN** [1] - 4:1  
**frequently** [2] - 18:24, 31:28  
**front** [7] - 28:3, 52:11, 59:11, 65:20, 76:10, 100:6, 102:28  
**full** [6] - 75:23, 97:2, 104:19, 106:7, 107:12, 108:15  
**function** [10] - 7:5, 8:20, 72:29, 73:5, 73:7, 74:3, 78:9, 93:3, 106:9, 108:16  
**functioning** [1] - 73:18  
**functions** [14] - 8:21, 8:23, 18:8, 65:1, 71:26, 74:6, 74:7, 75:10, 75:13, 78:24, 89:26, 89:28, 92:29, 112:1  
**fundamentally** [2] - 89:25, 102:17  
**funded** [1] - 90:8  
**furnished** [2] - 7:27, 68:16  
**FURTHER** [2] - 5:13, 45:3  
**furthering** [1] - 111:28  
**future** [2] - 54:1, 97:8  
**FÍONÁN** [1] - 4:6

## G

**Gail** [1] - 48:15  
**GAIL** [2] - 5:16, 48:19  
**GALLAGHER** [2] - 3:1, 3:1  
**garda** [15] - 35:1,

83:21, 86:12, 86:16, 86:23, 86:24, 86:25, 86:27, 86:29, 87:10, 87:17, 87:22, 88:3, 111:12  
**Garda** [69] - 10:2, 14:4, 21:6, 22:26, 22:29, 23:1, 24:15, 24:19, 24:20, 24:21, 24:23, 24:27, 24:28, 25:28, 27:8, 28:10, 30:13, 30:14, 32:3, 32:4, 32:7, 37:16, 39:17, 45:12, 58:25, 59:1, 77:29, 78:3, 78:7, 78:9, 78:20, 78:23, 78:27, 79:1, 81:6, 82:25, 83:2, 83:9, 83:17, 85:5, 85:8, 85:12, 85:19, 85:21, 85:23, 86:5, 86:11, 86:22, 87:18, 88:1, 88:17, 94:4, 94:10, 94:26, 94:28, 95:2, 95:3, 96:22, 98:15, 98:17, 108:25, 109:21, 110:14, 110:15, 111:15, 112:12, 112:21, 112:25  
**GARDA** [2] - 3:6, 3:16  
**garda's** [1] - 86:13  
**Gardaí** [46] - 10:16, 10:20, 10:23, 10:25, 12:4, 12:6, 14:12, 14:15, 17:25, 18:12, 19:10, 19:17, 21:7, 21:19, 21:25, 22:3, 22:5, 22:12, 22:24, 23:7, 23:8, 23:10, 23:14, 23:18, 66:23, 67:12, 67:16, 67:18, 67:21, 68:5, 78:14, 83:23, 83:24, 87:5, 88:24, 89:7, 95:14, 95:23, 95:24, 95:27, 96:7, 111:16, 111:23, 112:1, 113:6

**Gayle** [2] - 55:28, 60:20  
**general** [10] - 6:14, 7:2, 25:24, 31:21, 79:6, 87:1, 97:20, 98:6, 102:24, 104:25  
**generally** [8] - 25:29, 28:28, 59:6, 71:21, 72:2, 96:6, 97:26, 97:28  
**generated** [2] - 21:23, 43:1

**Gibson** [1] - 107:2  
**GILLANE** [1] - 3:4  
**given** [17] - 8:23, 9:27, 15:1, 16:1, 17:16, 18:10, 19:23, 32:23, 52:12, 53:18, 68:21, 73:20, 85:22, 92:15, 106:18, 107:3, 113:18  
**glanced** [1] - 33:27  
**Glasgow** [1] - 48:23  
**gleaned** [1] - 16:16  
**Gleeson** [1] - 74:15  
**God's** [1] - 64:21  
**GORDON** [1] - 2:15  
**governance** [7] - 72:26, 107:5, 107:7, 109:13, 109:16, 109:28, 110:5  
**governing** [1] - 91:2  
**graduated** [1] - 48:23  
**grave** [1] - 29:21  
**great** [1] - 62:21  
**greatest** [1] - 103:15  
**ground** [2] - 109:18, 113:6  
**grounds** [3] - 83:12, 88:15, 89:3  
**guard** [2] - 24:28, 37:22  
**guards** [3] - 58:28, 81:12, 85:22  
**guidance** [4] - 71:4, 71:25, 81:16, 81:19  
**Guidelines** [6] - 75:14, 75:16, 75:27, 82:27, 95:7, 108:23  
**guidelines** [10] - 70:20, 76:7, 77:28, 78:19, 83:26, 89:15, 89:24, 94:13, 94:20, 108:27  
**GUNNING** [1] - 3:25  
**Gwen** [1] - 1:25  
**GWEN** [1] - 1:30

## H

**HALIDAY** [1] - 2:16  
**HALL** [2] - 2:11, 4:3  
**HANAHOE** [1] - 3:10  
**hand** [1] - 12:3  
**handbook** [4] - 81:19, 81:22, 81:23, 82:9  
**handling** [1] - 85:16  
**hands** [1] - 44:18  
**handwritten** [6] - 11:10, 11:15, 11:21, 33:19, 33:22, 36:7

**happy** [1] - 33:20  
**HARCOURT** [1] - 2:25  
**hard** [2] - 38:16, 104:2  
**harm** [5] - 93:20, 101:26, 102:25, 103:21, 114:11  
**harmed** [1] - 93:20  
**HARRINGTON** [1] - 3:5  
**HARRISON** [1] - 3:6  
**HARTY** [1] - 3:6  
**HATCH** [4] - 2:11, 2:12, 4:3, 4:3  
**HAVING** [6] - 6:10, 24:8, 45:27, 48:19, 64:5, 70:14  
**HAYES** [1] - 3:20  
**head** [2] - 46:1, 64:16  
**headed** [2] - 8:26, 77:10  
**Headquarters** [1] - 28:11  
**health** [6] - 6:18, 6:19, 46:12, 46:13, 73:5, 90:26  
**Health** [2] - 8:20, 72:8  
**hear** [2] - 58:11, 58:19  
**heard** [3] - 42:5, 56:26, 95:22  
**HEARING** [4] - 6:1, 63:7, 64:1, 116:7  
**hearing** [1] - 58:20  
**heed** [1] - 59:25  
**HEGARTY** [1] - 3:13  
**HELD** [1] - 1:17  
**held** [8] - 34:14, 39:28, 40:12, 46:5, 84:9, 84:25, 95:28, 113:13  
**hello** [1] - 60:10  
**help** [3] - 6:4, 41:13, 75:12  
**helpful** [1] - 40:28  
**helping** [1] - 41:4  
**helps** [1] - 23:21  
**hierarchy** [1] - 112:25  
**high** [1] - 49:3  
**highlight** [2] - 82:29, 96:10  
**highlights** [1] - 77:15  
**himself** [2] - 32:12, 34:24  
**historical** [2] - 95:21, 114:21  
**historically** [1] - 90:23  
**history** [1] - 24:18  
**HOGAN** [1] - 2:9  
**hold** [2] - 67:13, 68:13  
**home** [1] - 92:2  
**honestly** [1] - 54:29

**hospital** [2] - 46:10, 64:29  
**HOUSE** [3] - 2:16, 2:21, 3:20  
**HR** [1] - 65:1  
**HSE** [56] - 2:23, 6:15, 6:28, 8:28, 10:21, 19:26, 21:9, 21:10, 34:3, 43:14, 49:13, 64:12, 64:15, 64:22, 65:5, 66:4, 66:11, 67:20, 72:18, 72:20, 72:27, 75:5, 78:20, 78:23, 78:25, 78:29, 79:19, 81:3, 81:6, 82:17, 82:26, 83:2, 83:7, 83:14, 83:15, 83:21, 83:25, 84:13, 85:5, 85:11, 86:13, 86:26, 87:2, 87:11, 87:18, 87:25, 88:2, 88:14, 88:16, 89:5, 90:14, 110:24, 111:8, 111:21, 111:23, 112:4  
**HSE/Tusla** [1] - 86:6  
**hubs** [1] - 105:2  
**huge** [2] - 41:4, 44:15  
**hundred** [1] - 54:25

## I

**idea** [2] - 16:24, 103:15  
**ideally** [1] - 105:27  
**identifiable** [3] - 13:27, 16:13, 73:27  
**identified** [16] - 8:3, 9:29, 10:2, 10:11, 12:18, 19:17, 20:24, 22:17, 73:28, 74:2, 74:7, 74:11, 90:28, 97:9, 105:9, 111:26  
**identifier** [5] - 12:20, 12:24, 13:24, 16:10, 16:22  
**identifiers** [2] - 17:13, 17:14  
**identifies** [1] - 112:20  
**identify** [7] - 10:13, 12:25, 14:1, 20:19, 30:3, 74:26, 98:1  
**identifying** [3] - 10:3, 74:4, 93:4  
**identities** [1] - 46:27  
**identity** [4] - 14:25, 15:5, 15:9, 103:24  
**ignoring** [1] - 109:16  
**ii** [1] - 86:20

**iii** [1] - 87:8  
**illustrates** [1] - 112:5  
**imagine** [6] - 38:27, 53:23, 54:19, 54:23, 54:29, 62:6  
**immediate** [6] - 80:3, 91:16, 91:24, 93:26, 93:27, 93:29  
**immediately** [15] - 9:12, 32:13, 32:14, 36:1, 36:10, 66:23, 79:20, 79:29, 80:4, 86:12, 88:2, 93:22, 93:25, 93:28, 112:20  
**implemented** [2] - 91:20, 97:24  
**imply** [1] - 10:17  
**importance** [4] - 81:28, 82:8, 82:12, 82:20  
**important** [2] - 19:27, 89:9  
**impossible** [1] - 14:1  
**impression** [2] - 37:28, 38:14  
**IN** [1] - 1:17  
**inaccuracy** [3] - 66:24, 66:28, 67:13  
**inaccurate** [10] - 9:6, 9:17, 11:6, 11:27, 12:5, 19:24, 38:10, 67:8, 68:14, 68:20  
**inappropriate** [2] - 23:14, 23:16  
**inappropriately** [1] - 110:29  
**inception** [1] - 50:7  
**incident** [15] - 7:27, 8:3, 8:25, 8:29, 9:14, 9:20, 13:6, 13:21, 47:17, 56:13, 68:28, 69:5, 83:27, 84:2, 85:24  
**incidents** [1] - 18:23  
**inclined** [2] - 14:12, 19:17  
**include** [1] - 82:5  
**included** [3] - 54:4, 84:12, 95:9  
**including** [1] - 6:19  
**inconclusive** [1] - 90:29  
**incorrect** [13] - 12:27, 16:21, 19:27, 21:15, 21:16, 21:19, 21:20, 23:6, 43:17, 66:2, 66:9, 68:1, 68:4  
**increasing** [1] - 76:15  
**INDEPENDENT** [1] - 3:23  
**INDEX** [1] - 5:1  
**indicate** [3] - 43:14, 82:20, 111:20  
**indicated** [7] - 13:23, 13:28, 14:17, 16:9, 16:14, 16:18, 45:8  
**indicates** [2] - 95:1, 112:12  
**indicating** [2] - 13:19, 112:17  
**indication** [1] - 41:17  
**individual** [9] - 13:26, 16:12, 53:6, 88:7, 94:25, 103:29, 104:19, 110:7, 114:19  
**individuals** [2] - 74:29, 92:14  
**inform** [9] - 42:21, 68:18, 97:3, 98:14, 101:5, 101:12, 103:23, 111:8, 116:3  
**informal** [2] - 88:9, 88:17  
**information** [44] - 9:7, 9:17, 11:6, 12:19, 12:24, 13:27, 15:1, 15:13, 15:14, 16:13, 17:16, 19:29, 20:13, 20:14, 20:17, 21:20, 22:25, 32:22, 56:9, 62:2, 62:8, 66:22, 74:28, 77:17, 77:22, 88:26, 89:11, 93:8, 93:19, 95:27, 96:8, 98:3, 99:26, 101:22, 101:26, 101:28, 102:19, 106:27, 109:5, 113:20, 114:9, 115:4, 115:15  
**Information** [5] - 6:21, 6:22, 6:23, 7:6, 65:2  
**informed** [8] - 52:20, 66:24, 67:2, 68:13, 91:19, 92:14, 102:17, 110:28  
**informing** [3] - 10:7, 67:12, 101:17  
**informs** [1] - 86:12  
**initial** [8] - 39:26, 50:10, 104:9, 104:11, 113:27, 113:29, 114:25  
**injured** [1] - 113:18  
**input** [1] - 68:3  
**inquire** [1] - 94:27  
**inquiries** [1] - 77:3  
**inquiring** [2] - 40:7, 43:21  
**inquiry** [13] - 18:8, 45:7, 66:17, 84:23, 84:24, 113:3, 113:4, 113:8, 113:12, 113:17, 113:26, 114:17, 114:24  
**INQUIRY** [2] - 1:3, 1:9  
**insofar** [5] - 28:14, 29:10, 30:2, 69:9, 90:13  
**INSPECTOR** [7] - 5:7, 24:8, 31:4, 39:9, 41:29, 43:9, 45:3  
**Inspector** [7] - 24:5, 27:28, 29:4, 31:6, 38:2, 41:19, 43:12  
**inspector** [11] - 24:11, 24:13, 25:5, 25:12, 25:15, 25:18, 25:19, 35:18, 35:20, 35:21, 39:11  
**inspector/sergeant** [2] - 87:23, 88:3  
**instance** [5] - 9:3, 41:19, 79:26, 89:4, 101:14  
**instruct** [1] - 31:25  
**INSTRUCTED** [12] - 2:10, 2:16, 2:20, 2:23, 2:28, 3:5, 3:9, 3:15, 3:17, 3:20, 3:25, 4:2  
**instruction** [1] - 29:28  
**instructions** [1] - 52:12  
**INSTRUMENT** [1] - 1:8  
**intake** [4] - 51:20, 54:17, 112:9, 112:19  
**integral** [1] - 79:2  
**integrated** [1] - 46:6  
**integration** [1] - 64:29  
**intend** [3] - 26:19, 75:24, 101:9  
**intending** [1] - 40:28  
**intention** [1] - 39:27  
**inter** [1] - 88:23  
**inter-agency** [1] - 88:23  
**interaction** [2] - 50:21, 108:25  
**interactions** [1] - 18:25  
**interest** [2] - 67:22, 76:12  
**interests** [2] - 91:17, 92:3  
**interim** [1] - 70:25  
**Internal** [1] - 6:23  
**internal** [3] - 84:27, 84:29, 108:18  
**interpretation** [1] - 37:1  
**interventions** [1] - 93:23  
**interview** [8] - 78:10, 100:28, 101:18, 104:9, 104:11, 114:10, 114:18, 114:21  
**interviewed** [1] - 97:2  
**INTO** [1] - 1:3  
**intranet** [1] - 105:2  
**investigate** [1] - 87:6  
**investigated** [4] - 37:19, 37:29, 83:24, 89:7  
**investigates** [1] - 86:28  
**investigating** [1] - 78:15  
**investigation** [9] - 78:9, 78:11, 78:28, 87:24, 95:15, 95:17, 111:12, 111:16, 112:2  
**invite** [1] - 103:22  
**involve** [2] - 53:7, 83:12  
**involved** [15] - 7:23, 20:10, 22:16, 32:8, 34:1, 35:2, 35:4, 39:20, 51:29, 52:8, 57:25, 71:8, 82:23, 84:16, 85:13  
**involvement** [5] - 7:18, 7:26, 54:6, 61:22, 78:3  
**involves** [1] - 70:29  
**involving** [1] - 34:6  
**Ireland** [3] - 48:26, 71:19, 76:5  
**IRISH** [1] - 3:19  
**issue** [14] - 7:18, 9:12, 12:28, 17:3, 17:21, 28:25, 28:26, 32:13, 33:7, 34:27, 41:8, 61:16, 65:12, 83:26  
**issued** [2] - 66:25, 71:5  
**issues** [7] - 56:14, 65:8, 105:9, 106:10, 109:1, 109:13, 109:17  
**items** [1] - 41:11  
**iv** [1] - 87:16  
**J**  
**January** [2] - 24:27, 61:24  
**Jim** [2] - 34:16, 107:2  
**job** [6] - 70:29, 71:14, 74:22, 111:19, 111:20, 112:21  
**jobs** [1] - 71:28  
**JOHN** [4] - 3:9, 3:14, 3:26, 4:1  
**John** [1] - 64:21  
**joined** [1] - 24:20  
**joint** [2] - 59:20, 78:29  
**JON** [1] - 2:23  
**journal** [2] - 38:29, 39:3  
**JUDGE** [2] - 1:12, 2:3  
**Judge** [1] - 62:29  
**judgement** [1] - 52:13  
**judgment** [3] - 74:15, 96:4, 102:18  
**July** [9] - 35:10, 42:23, 43:25, 44:21, 45:9, 45:15, 56:27, 64:9  
**JULY** [3] - 1:18, 6:2, 116:7  
**jump** [1] - 112:8  
**jumped** [1] - 112:15  
**June** [2] - 34:15, 39:29  
**justice** [2] - 78:6, 92:13  
**JUSTICE** [3] - 1:8, 1:12, 2:2  
**K**  
**KAREN** [2] - 5:7, 24:8  
**Karen** [1] - 24:5  
**KATHLEEN** [1] - 2:7  
**KATHY** [1] - 2:20  
**KAVANAGH** [1] - 2:4  
**Kay** [4] - 51:6, 52:20, 53:4, 60:22  
**KEALY** [1] - 3:29  
**Keara** [2] - 112:9, 112:19  
**keep** [4] - 19:28, 23:26, 55:2, 82:3  
**keeping** [6] - 81:28, 82:8, 82:13, 82:20, 82:21, 108:26  
**KEITH** [1] - 3:6  
**KELLY** [5] - 2:10, 2:11, 3:23, 4:2, 4:2  
**KENNEDY** [1] - 3:4  
**Kenny** [28] - 25:17, 25:21, 26:8, 26:28, 27:15, 28:8, 28:19, 29:29, 30:10, 32:11, 32:15, 32:20, 32:27, 32:29, 33:13, 33:28,

34:22, 34:28, 35:11,  
36:2, 36:15, 36:21,  
37:12, 39:27, 40:10,  
42:18, 44:19, 45:8  
**Kenny's** [3] - 31:18,  
38:23, 42:17  
**kept** [7] - 12:5, 27:17,  
42:16, 42:28, 42:29,  
77:12, 77:17  
**KEVIN** [1] - 3:17  
**KEVIN'S** [2] - 2:12, 4:4  
**key** [2] - 91:2, 92:24  
**KIERAN** [3] - 2:10,  
3:23, 4:2  
**KILFEATHER** [1] - 3:7  
**KIMBER** [1] - 3:16  
**kind** [7] - 42:22, 71:10,  
72:18, 72:26, 80:24,  
84:21, 105:9  
**knowing** [2] - 38:20,  
59:24  
**knowledge** [14] - 7:23,  
10:28, 11:1, 30:1,  
38:17, 38:18, 44:15,  
51:17, 52:16, 58:8,  
67:24, 104:19,  
106:20, 108:13  
**known** [7] - 21:27,  
28:28, 72:15, 86:5,  
94:28, 95:14, 97:26

## L

**lack** [1] - 82:17  
**laid** [2] - 85:7, 90:20  
**lapse** [1] - 58:14  
**large** [2] - 55:6, 55:8  
**last** [4] - 20:8, 25:20,  
80:20, 110:25  
**late** [1] - 6:4  
**Laura** [3] - 109:18,  
109:19, 112:17  
**LAVERY** [1] - 3:20  
**law** [3] - 6:21, 74:7,  
74:10  
**LAWLOR** [1] - 3:15  
**lay** [1] - 111:11  
**lead** [1] - 41:7  
**leader** [3] - 51:7, 89:1,  
106:4  
**Leader** [1] - 88:2  
**LEADER** [24] - 2:7,  
5:8, 5:11, 5:20, 5:22,  
5:25, 24:5, 24:9,  
24:11, 31:1, 41:27,  
41:29, 42:2, 64:3,  
64:6, 64:8, 70:4,  
70:11, 70:15, 70:17,  
105:18, 115:12,  
115:13, 115:20  
**leaders** [1] - 104:26  
**learning** [1] - 64:20  
**leave** [2] - 35:20,  
107:7  
**left** [2] - 18:13, 112:3  
**legal** [4] - 42:4, 42:19,  
89:27, 107:27  
**legally** [1] - 104:9  
**legibility** [1] - 36:12  
**legible** [1] - 36:14  
**legislation** [2] - 71:6,  
72:15  
**legitimate** [1] - 88:29  
**LEGORBURU** [1] -  
2:23  
**LEHANE** [1] - 3:14  
**Leitrim** [1] - 46:2  
**Leo** [2] - 34:17, 34:24  
**less** [2] - 13:7, 52:17  
**letter** [22] - 14:16,  
17:27, 20:15, 20:18,  
28:1, 56:17, 56:18,  
57:12, 57:16, 58:1,  
58:6, 61:27, 64:8,  
66:27, 67:12,  
102:11, 102:26,  
103:2, 103:16,  
104:17, 109:22,  
114:4  
**letters** [6] - 54:2,  
54:12, 54:15, 57:15,  
102:20, 102:24  
**level** [7] - 29:7,  
106:25, 108:22,  
109:10, 109:11,  
109:24  
**levels** [2] - 6:28,  
107:18  
**liaison** [4] - 82:26,  
86:16, 86:25, 86:29  
**Liaison** [1] - 87:18  
**light** [4] - 8:11, 9:9,  
67:7, 76:17  
**likely** [1] - 56:10  
**likewise** [1] - 18:23  
**limited** [3] - 21:10,  
99:6, 108:14  
**line** [1] - 37:16  
**link** [1] - 13:10  
**list** [5] - 50:17, 50:20,  
50:23, 115:25, 116:3  
**LITTLE** [1] - 2:21  
**living** [1] - 92:4  
**local** [4] - 85:12,  
85:21, 85:23, 85:24  
**located** [1] - 39:15  
**locker** [3] - 27:18,  
27:19, 27:23  
**LONGFORD** [1] - 3:27

**look** [14] - 8:5, 8:25,  
12:10, 13:15, 16:25,  
22:27, 36:13, 43:14,  
55:14, 60:16, 69:11,  
108:18, 110:17,  
110:26  
**looked** [6] - 46:12,  
61:6, 61:7, 80:14,  
106:4, 113:24  
**looking** [10] - 15:29,  
16:26, 16:28, 19:5,  
21:8, 34:1, 37:14,  
60:11, 65:11, 69:24  
**loosely** [1] - 28:26  
**Louth** [2] - 46:7, 47:21  
**Louth-Meath** [1] -  
46:7  
**LOWER** [2] - 2:12, 4:3  
**lower** [1] - 53:24  
**Lowry** [4] - 49:18,  
55:13, 59:3, 59:8  
**Lowry's** [1] - 50:14  
**LUNCH** [2] - 63:7,  
64:1  
**Lynch** [3] - 6:8, 6:13,  
46:15  
**LYNCH** [4] - 5:3, 6:10,  
15:22, 21:1  
**lynch** [1] - 21:4

## M

**MADE** [2] - 1:3, 1:8  
**main** [1] - 21:10  
**maintained** [1] - 81:29  
**maintaining** [2] -  
82:18, 92:2  
**MAIRE** [1] - 3:16  
**majority** [1] - 16:19  
**Malone** [1] - 1:25  
**MALONE** [1] - 1:30  
**manage** [1] - 87:23  
**managed** [1] - 80:15  
**management** [12] -  
6:19, 6:20, 29:3,  
50:21, 79:13, 81:15,  
81:20, 81:25,  
106:11, 109:29,  
110:5  
**manager** [17] - 6:14,  
7:2, 7:6, 46:6, 47:2,  
47:20, 47:21, 48:27,  
49:3, 49:7, 49:19,  
64:16, 64:23, 64:25,  
65:6, 71:15  
**managers** [1] - 104:26  
**managing** [2] - 46:10,  
50:21  
**manner** [3] - 37:25,  
80:11, 108:28  
**March** [6] - 49:18,  
51:5, 52:2, 52:3,  
54:21, 54:22  
**MARK** [2] - 3:6, 3:19  
**mark** [1] - 44:12  
**marked** [3] - 31:12,  
31:14, 103:10  
**MARRINAN** [8] - 2:6,  
5:15, 6:7, 45:24,  
45:28, 45:29, 48:8,  
48:10  
**MARTIN** [1] - 3:13  
**Mary** [1] - 111:4  
**master's** [1] - 71:16  
**material** [1] - 28:17  
**materials** [17] - 24:12,  
27:21, 28:2, 64:10,  
65:20, 66:7, 70:24,  
79:11, 82:28, 85:6,  
89:17, 91:3, 93:13,  
96:14, 100:6, 102:8,  
102:27  
**matter** [46] - 8:13,  
8:15, 23:28, 29:25,  
30:9, 31:16, 34:29,  
40:19, 42:11, 42:24,  
43:4, 43:12, 45:6,  
45:16, 46:27, 48:6,  
69:28, 77:18, 84:11,  
87:6, 87:7, 88:1,  
89:8, 95:13, 95:28,  
99:20, 100:1, 100:3,  
104:13, 106:29,  
108:15, 108:17,  
109:23, 112:2,  
112:3, 112:16,  
113:7, 113:9,  
113:19, 113:24,  
113:27, 114:1,  
114:8, 114:20,  
115:2, 115:16  
**matters** [21] - 25:27,  
29:12, 30:12, 30:26,  
41:18, 43:3, 43:19,  
45:9, 103:8, 104:19,  
104:24, 105:17,  
106:5, 107:5,  
107:24, 109:8,  
109:14, 110:2,  
111:11, 116:1  
**MATTERS** [1] - 1:5  
**Maurice** [12] - 7:18,  
37:5, 39:18, 39:21,  
40:26, 45:13, 55:29,  
58:12, 58:20, 59:22,  
59:28, 60:29  
**McCabe** [45] - 2:14,  
7:18, 8:2, 9:29,  
15:25, 30:27, 31:7,  
35:6, 37:5, 39:18,  
39:21, 39:24, 40:26,  
41:10, 45:13, 55:29,  
56:3, 56:4, 56:5,  
56:12, 56:19, 58:11,  
58:12, 58:16, 58:19,  
58:20, 59:13, 59:14,  
59:17, 59:19, 59:22,  
60:9, 60:29, 62:7,  
62:17, 105:25,  
110:29, 111:7,  
112:4, 114:3,  
114:28, 115:8  
**McCabe** [1] - 111:7  
**McCabe's** [2] - 59:28,  
61:24  
**McDERMOTT** [1] -  
2:27  
**McDOWELL** [1] - 2:14  
**McDowell's** [1] -  
15:27  
**McGarry** [24] - 2:15,  
15:20, 15:22, 15:24,  
15:26, 15:29, 31:4,  
31:6, 38:4, 38:8,  
38:20, 39:6, 40:7,  
48:9, 60:7, 60:8,  
70:6, 105:22,  
105:24, 110:9  
**MCGARRY** [4] - 5:5,  
5:9, 5:18, 5:23  
**McGinn** [2] - 34:17,  
34:25  
**McGlone** [3] - 95:22,  
112:9, 112:19  
**McGUINNESS** [5] -  
2:6, 5:4, 5:6, 5:17,  
5:24  
**McGuinness** [28] -  
2:19, 3:14, 6:11,  
6:13, 15:17, 20:28,  
21:2, 21:4, 21:5,  
23:25, 23:29, 48:15,  
48:20, 48:22, 56:23,  
56:25, 56:29, 57:2,  
57:5, 60:2, 62:22,  
62:24, 62:29, 70:7,  
110:11, 110:13,  
110:14, 115:25  
**McGuinness's** [1] -  
6:8  
**MCKECHNIE** [1] -  
2:27  
**McLoughlin** [22] -  
51:6, 51:18, 52:20,  
53:4, 53:10, 53:17,  
54:8, 54:13, 55:1,  
55:9, 55:13, 56:21,  
57:6, 58:7, 59:10,  
60:13, 61:13, 61:28,

62:3, 62:8, 100:2, 100:7  
**mean** [17] - 23:23, 27:23, 27:24, 32:17, 37:22, 38:5, 38:9, 38:26, 41:4, 42:16, 44:13, 62:24, 77:12, 96:3, 101:16, 109:28, 114:16  
**meant** [1] - 11:25  
**Meath** [4] - 46:7, 47:21, 64:24, 111:5  
**media** [5] - 42:25, 56:4, 59:12, 59:13, 59:16  
**MEDIA** [1] - 3:23  
**medical** [1] - 65:1  
**meet** [7] - 11:27, 13:11, 17:24, 18:11, 61:26, 101:18, 104:1  
**meeting** [41] - 34:8, 34:14, 34:15, 34:20, 34:25, 34:26, 34:28, 35:8, 35:27, 36:5, 36:17, 37:2, 39:26, 39:28, 40:4, 40:8, 40:13, 40:16, 40:19, 40:21, 40:22, 40:24, 40:25, 41:19, 42:3, 43:29, 44:20, 45:9, 45:11, 45:14, 54:9, 62:9, 89:28, 102:4, 102:5, 103:21, 104:8, 110:18, 110:19  
**meetings** [4] - 25:29, 35:16, 54:15, 81:7  
**MEMBER** [2] - 1:12, 2:2  
**member** [12] - 10:2, 27:8, 30:14, 32:23, 33:11, 34:6, 58:24, 59:1, 71:18, 87:5, 106:11, 111:6  
**members** [9] - 18:24, 21:6, 25:28, 26:5, 27:10, 32:3, 32:4, 32:8, 110:15  
**memory** [2] - 58:13, 65:15  
**mention** [1] - 58:11  
**mentioned** [5] - 33:3, 45:7, 55:12, 57:8, 82:9  
**mentions** [1] - 77:6  
**met** [6] - 53:29, 54:9, 56:3, 56:6, 57:14, 110:1  
**methods** [1] - 78:24  
**MI** [1] - 75:7  
**MICHAEL** [6] - 2:14, 2:23, 3:8, 3:10, 3:13, 3:29  
**microphone** [2] - 15:27  
**mid** [1] - 24:27  
**mid-January** [1] - 24:27  
**midlands/Louth/Meath** [1] - 64:17  
**might** [17] - 31:2, 33:3, 38:16, 44:4, 50:23, 52:14, 66:17, 70:5, 74:2, 74:4, 74:26, 95:14, 105:19, 113:5, 113:14, 114:19  
**mind** [9] - 20:12, 24:18, 43:12, 43:16, 43:21, 44:3, 44:21, 59:29, 110:16  
**MINISTER** [1] - 1:8  
**minute** [7] - 26:29, 28:8, 28:21, 32:18, 32:19, 34:22, 62:16  
**minutes** [3] - 22:21, 38:24, 110:18  
**missed** [2] - 114:27, 114:28  
**mistake** [2] - 69:6, 69:8  
**mitigate** [3] - 47:16, 68:27, 69:4  
**moment** [1] - 36:8  
**Monaghan** [14] - 26:11, 34:17, 34:23, 43:28, 45:25, 45:29, 46:2, 49:11, 49:22, 49:23, 50:1, 54:6, 65:7, 68:23  
**MONAGHAN** [2] - 5:14, 45:27  
**Monaghan's** [1] - 65:24  
**monitor** [1] - 87:24  
**month** [2] - 40:3, 54:24  
**months** [1] - 24:25  
**mood** [2] - 40:16, 45:10  
**moral** [1] - 76:3  
**MORAN** [1] - 3:18  
**morning** [4] - 40:14, 46:16, 62:3, 65:10  
**most** [3] - 35:22, 80:10, 80:11  
**mostly** [1] - 73:27  
**Mountjoy** [1] - 24:23  
**MR** [113] - 1:12, 2:2, 2:4, 2:6, 2:6, 2:9, 2:10, 2:10, 2:14, 2:15, 2:15, 2:18, 2:19, 2:19, 2:23, 2:23, 2:24, 2:24, 2:27, 3:1, 3:4, 3:4, 3:6, 3:8, 3:9, 3:13, 3:14, 3:15, 3:17, 3:19, 3:23, 3:25, 3:29, 4:1, 4:1, 4:2, 4:6, 5:4, 5:5, 5:6, 5:9, 5:10, 5:13, 5:14, 5:15, 5:17, 5:18, 5:21, 5:23, 5:24, 6:7, 6:11, 6:13, 15:17, 15:20, 15:22, 15:24, 15:29, 20:27, 20:28, 21:1, 21:4, 23:25, 23:29, 31:4, 31:6, 38:4, 38:8, 38:20, 39:6, 39:7, 39:9, 39:11, 41:16, 41:24, 44:27, 45:1, 45:4, 45:6, 45:18, 45:24, 45:27, 45:28, 45:29, 48:8, 48:9, 48:10, 48:15, 48:20, 48:22, 56:25, 56:29, 57:2, 57:5, 60:2, 60:7, 60:8, 62:20, 62:22, 62:29, 70:6, 70:7, 70:14, 105:22, 105:24, 110:9, 110:11, 110:13, 115:12, 115:25  
**MS** [43] - 2:7, 2:7, 2:9, 2:20, 2:27, 3:5, 3:13, 3:16, 3:17, 3:25, 3:25, 5:3, 5:8, 5:11, 5:16, 5:19, 5:20, 5:22, 5:25, 6:10, 15:22, 21:1, 24:5, 24:9, 24:11, 31:1, 41:27, 41:29, 42:2, 48:19, 60:7, 64:3, 64:5, 64:6, 64:8, 70:4, 70:11, 70:15, 70:17, 105:18, 115:12, 115:13, 115:20  
**MTP** [5] - 55:29, 59:20, 60:13, 60:24, 112:13  
**MUIRCHEARTAIGH** [1] - 4:6  
**MULLAN** [1] - 2:7  
**Mullingar** [12] - 34:8, 35:10, 35:12, 35:14, 40:3, 40:9, 40:11, 40:13, 40:16, 41:19, 43:29, 45:15  
**murders** [2] - 32:3, 33:5  
**must** [8] - 20:3, 79:19, 83:9, 83:15, 91:9, 93:22, 94:10, 98:21  
**mutuality** [1] - 14:28  
**MICHEÁL** [1] - 2:18  

## N

**name** [9] - 15:24, 21:4, 31:6, 59:28, 60:8, 69:19, 86:13, 105:24, 110:13  
**named** [2] - 1:27, 85:17  
**names** [2] - 46:26, 69:15  
**Natasha** [2] - 47:24, 65:23  
**national** [3] - 7:25, 71:4, 72:24  
**National** [4] - 14:5, 14:7, 68:12, 68:19  
**natural** [1] - 92:12  
**nature** [8] - 9:7, 9:14, 9:18, 10:26, 11:7, 29:21, 31:16, 69:29  
**NCS** [3] - 8:28, 14:4, 68:12  
**necessarily** [2] - 52:8, 61:1  
**necessary** [7] - 13:29, 14:3, 41:8, 91:20, 91:26, 91:28, 93:23  
**need** [11] - 8:14, 13:9, 15:7, 15:8, 56:8, 96:9, 97:1, 100:28, 105:8, 107:15, 116:3  
**needed** [2] - 12:12, 55:2  
**neglect** [4] - 70:23, 78:4, 89:20, 93:21  
**neglected** [2] - 83:9, 94:10  
**never** [5] - 36:15, 39:5, 42:4, 46:26, 56:3  
**new** [9] - 82:22, 84:8, 90:17, 90:18, 90:22, 96:17, 96:21, 97:15, 97:18  
**NEWS** [1] - 3:23  
**NEWSPAPERS** [1] - 3:29  
**next** [11] - 11:26, 11:27, 17:29, 24:5, 45:24, 48:15, 64:3, 70:11, 84:10, 84:28, 115:6  
**NIALL** [1] - 2:10  
**nobody** [1] - 12:17  
**nominate** [1] - 111:6  
**non** [2] - 7:7, 109:14  
**non-compliance** [1] - 109:14  
**non-statutory** [1] - 7:7  
**none** [3] - 35:2, 35:4, 58:22  
**normal** [5] - 6:6, 18:2, 18:6, 49:26, 51:10  
**normally** [5] - 35:16, 61:26, 85:25, 85:26, 114:7  
**Northeast** [5] - 6:15, 7:8, 7:9, 49:13, 49:14  
**Northern** [3] - 24:15, 25:13, 35:14  
**note** [7] - 11:15, 11:21, 14:6, 32:11, 33:14, 35:17, 54:8  
**noted** [3] - 15:2, 43:27, 69:6  
**notes** [21] - 1:27, 11:10, 11:13, 33:19, 33:22, 35:24, 35:26, 36:5, 36:7, 36:9, 36:17, 36:27, 37:1, 37:7, 37:10, 37:11, 41:21, 45:15, 45:16, 54:14  
**notetaker** [2] - 40:20, 41:20  
**nothing** [4] - 38:3, 62:15, 82:22, 96:17  
**notification** [46] - 10:27, 10:28, 11:1, 21:19, 21:21, 21:25, 21:29, 22:11, 22:12, 22:19, 22:23, 22:24, 22:29, 23:17, 26:10, 27:29, 29:7, 30:14, 31:9, 32:9, 33:7, 37:26, 81:5, 81:6, 83:21, 83:25, 84:1, 84:14, 84:19, 85:8, 85:12, 85:14, 85:19, 85:22, 86:10, 86:19, 88:16, 88:22, 88:28, 89:1, 89:3, 89:14, 108:24, 109:19, 112:26, 115:8  
**notifications** [3] - 84:5, 87:1, 109:4  
**notified** [12] - 10:26, 29:6, 32:6, 58:15, 83:2, 83:9, 83:23, 84:3, 94:11, 98:16,

104:15, 109:5  
**notifies** [1] - 96:22  
**notify** [5] - 31:28,  
32:14, 85:5, 112:12,  
112:22  
**notifying** [5] - 37:5,  
83:17, 94:4, 95:23,  
113:6  
**November** [2] - 24:22,  
46:5  
**NSE** [1] - 68:16  
**number** [9] - 6:17,  
8:17, 18:17, 50:26,  
53:29, 54:27, 57:13,  
76:15, 86:8  
**numerous** [1] - 8:24  
**nurse** [2] - 64:20,  
64:23  
**nurses** [1] - 46:12

---

## O

---

**O'DONNELL** [1] - 2:24  
**O'HIGGINS** [15] - 2:18,  
3:8, 5:10, 5:13, 39:7,  
39:9, 39:11, 41:16,  
41:24, 44:27, 45:1,  
45:4, 45:6, 45:18,  
62:20  
**O'Higgins** [2] - 40:28,  
41:15  
**O'REILLY** [2] - 3:16,  
4:6  
**O'Reilly** [1] - 111:4  
**O'Sullivan** [2] - 30:20,  
30:23  
**objectives** [2] - 21:11,  
71:11  
**obligation** [9] - 76:2,  
76:4, 77:5, 77:6,  
97:20, 99:19,  
101:18, 107:27  
**obligations** [6] -  
97:21, 106:24,  
107:17, 108:2,  
108:27, 109:25  
**obliged** [1] - 45:1  
**obtain** [1] - 87:12  
**obviously** [26] - 12:26,  
27:4, 33:6, 34:29,  
35:14, 41:3, 42:18,  
49:13, 57:9, 61:12,  
80:10, 98:4, 101:16,  
101:17, 103:23,  
104:2, 106:10,  
106:11, 106:13,  
108:6, 108:19,  
109:4, 113:9,  
114:10, 114:26

**occasion** [4] - 26:14,  
35:19, 36:28, 61:14  
**occasions** [3] - 8:24,  
32:5, 61:27  
**occurred** [7] - 13:6,  
14:20, 46:20, 56:14,  
72:11, 85:24, 109:17  
**occurs** [1] - 84:1  
**October** [1] - 24:20  
**OF** [4] - 1:3, 1:9, 1:12,  
2:3  
**offence** [1] - 32:7  
**offences** [1] - 78:28  
**offenders** [1] - 78:6  
**offer** [3] - 59:10,  
103:24, 111:7  
**OFFICE** [1] - 2:20  
**office** [63] - 23:2,  
24:14, 25:1, 25:4,  
25:6, 25:9, 25:13,  
25:23, 25:24, 26:1,  
26:3, 26:4, 26:22,  
26:23, 26:24, 27:11,  
27:23, 28:4, 28:7,  
28:10, 28:18, 29:5,  
29:12, 29:14, 29:16,  
29:22, 30:3, 30:4,  
30:6, 31:12, 31:17,  
31:23, 32:2, 32:6,  
32:21, 32:25, 33:4,  
33:10, 33:14, 36:9,  
37:15, 37:17, 37:27,  
38:22, 39:4, 40:10,  
42:13, 42:15, 42:26,  
43:24, 47:3, 47:21,  
49:20, 54:7, 54:13,  
55:23, 58:21, 59:19,  
64:24, 71:7, 99:6  
**officer** [1] - 115:17  
**officer's** [1] - 39:2  
**officers** [1] - 35:17  
**often** [1] - 76:17  
**old** [2] - 56:13, 84:4  
**ON** [4] - 1:6, 1:10,  
1:18, 6:1  
**once** [1] - 102:8  
**one** [29] - 15:24,  
19:13, 20:28, 21:10,  
36:11, 36:27, 39:7,  
40:29, 41:27, 42:3,  
43:11, 44:4, 45:6,  
52:22, 54:22, 54:24,  
55:29, 60:26, 60:27,  
61:15, 66:10, 70:19,  
75:3, 84:21, 85:13,  
102:8, 103:18,  
115:13  
**ongoing** [4] - 42:16,  
42:28, 93:20, 105:6  
**onus** [1] - 77:2

**open** [8] - 31:12,  
31:13, 31:15, 41:14,  
45:12, 89:18, 98:5,  
98:8  
**open-ended** [1] -  
41:14  
**opened** [3] - 27:3,  
30:23, 94:15  
**operate** [1] - 81:3  
**Operating** [3] - 69:3,  
84:7, 85:1  
**operating** [1] - 113:1  
**operational** [3] - 40:6,  
47:14, 71:3  
**operations** [2] - 107:2,  
115:17  
**opinion** [1] - 19:7  
**opportunity** [2] - 56:7,  
92:16  
**opposed** [2] - 38:10,  
43:21  
**options** [1] - 50:11  
**order** [11] - 69:4,  
71:28, 73:26, 75:10,  
75:13, 87:12, 88:18,  
89:2, 89:6, 92:28,  
113:8  
**organisation** [8] -  
68:6, 71:4, 71:10,  
71:11, 80:13, 80:18,  
109:9, 110:8  
**organise** [1] - 34:13  
**organised** [2] - 34:9,  
34:28  
**organising** [1] - 25:29  
**original** [3] - 36:11,  
37:20, 90:25  
**originally** [1] - 64:20  
**OSMOND** [1] - 2:21  
**OTHER** [1] - 1:4  
**otherwise** [1] - 83:17  
**ou** [1] - 81:13  
**ought** [2] - 112:27,  
114:3  
**ourselves** [3] - 87:2,  
88:24, 95:20  
**outcome** [10] - 90:2,  
90:4, 90:7, 90:8,  
90:12, 95:16, 99:22,  
101:23, 101:25,  
101:29  
**outcomes** [2] - 90:24,  
90:27  
**outline** [6] - 70:29,  
77:14, 79:6, 79:12,  
102:23, 105:28  
**outlined** [16] - 8:12,  
46:19, 66:13, 72:17,  
89:28, 90:27, 97:23,  
97:25, 98:9, 100:17,

101:24, 108:4,  
108:7, 111:22,  
112:6, 114:6  
**outlines** [6] - 76:13,  
77:20, 78:14, 78:19,  
83:5, 90:6  
**outlining** [3] - 24:18,  
56:6, 66:28  
**outside** [1] - 83:14  
**outstanding** [2] -  
42:14, 56:5  
**overall** [2] - 51:25,  
78:7  
**overly** [1] - 37:20  
**oversight** [7] - 64:27,  
107:4, 107:7,  
109:13, 109:16,  
109:28, 110:5  
**overstep** [1] - 44:12  
**overview** [1] - 87:1  
**own** [7] - 7:13, 11:10,  
52:13, 52:16, 52:25,  
92:2

---

## P

---

**p.m** [1] - 110:20  
**PAGE** [1] - 5:2  
**page** [30] - 8:5, 8:26,  
11:13, 24:12, 28:2,  
45:25, 47:6, 47:24,  
48:17, 55:15, 64:9,  
65:19, 70:18, 70:20,  
70:23, 76:6, 78:19,  
79:14, 81:23, 82:27,  
85:5, 91:3, 93:13,  
96:13, 96:28, 100:5,  
102:7, 102:27,  
112:8, 112:11  
**pages** [2] - 66:6, 66:7  
**paid** [1] - 59:25  
**paper** [2] - 33:18,  
33:23  
**paragraph** [23] - 9:15,  
10:17, 76:7, 76:13,  
77:9, 77:20, 77:27,  
78:13, 78:18, 79:15,  
81:1, 81:26, 83:5,  
83:10, 83:20, 85:6,  
88:9, 91:4, 94:1,  
94:4, 94:12, 94:23,  
95:8  
**paramount** [3] -  
77:16, 91:10, 92:5  
**pardon** [2] - 10:29,  
75:19  
**parents** [2] - 73:20,  
92:1  
**parking** [1] - 24:26

**PARLIAMENT** [1] -  
3:11  
**parliamentary** [1] -  
65:2  
**part** [17] - 19:8, 29:14,  
49:13, 54:6, 54:28,  
65:5, 72:18, 78:11,  
79:2, 79:11, 81:24,  
84:24, 93:10, 103:1,  
103:27, 106:25,  
113:12  
**partial** [3] - 107:11,  
107:20, 109:2  
**participants** [1] -  
40:25  
**participate** [1] - 99:2  
**particular** [38] - 13:26,  
16:12, 58:28, 59:29,  
60:18, 65:7, 65:12,  
65:15, 71:14, 73:26,  
74:23, 75:4, 75:8,  
75:11, 75:25, 76:12,  
77:2, 77:26, 78:14,  
80:20, 86:28, 87:3,  
87:5, 89:11, 89:26,  
91:1, 92:13, 95:9,  
96:10, 97:4, 100:1,  
101:14, 103:14,  
105:12, 108:3,  
109:11, 114:29  
**particularly** [6] -  
72:21, 75:26, 76:8,  
90:19, 90:21, 96:12  
**parties** [6] - 14:25,  
40:6, 46:22, 93:8,  
101:12, 104:15  
**party** [2] - 91:26,  
113:18  
**PASSED** [1] - 1:5  
**past** [1] - 9:5  
**PATRICIA** [3] - 3:5,  
5:19, 64:5  
**Patricia** [5] - 47:2,  
47:19, 47:29, 64:3,  
65:27  
**PATRICK** [1] - 2:6  
**Paul** [4] - 15:24, 31:6,  
60:8, 105:24  
**PAUL** [4] - 2:15, 2:27,  
3:25, 4:1  
**Penders** [4] - 48:16,  
48:22, 60:3, 60:8  
**PENDERS** [3] - 5:16,  
48:19, 60:7  
**penny** [1] - 44:4  
**people** [27] - 26:2,  
27:13, 30:7, 35:2,  
35:4, 38:16, 40:5,  
50:10, 53:29, 57:13,  
57:14, 57:23, 57:26,



58:15, 69:16, 75:29,  
77:14, 84:4, 89:9,  
90:14, 98:4, 103:16,  
106:17, 106:21,  
107:18, 109:9, 116:3  
**per**<sup>[4]</sup> - 10:21, 18:21,  
27:24, 98:14  
**percent**<sup>[1]</sup> - 54:25  
**perform**<sup>[2]</sup> - 25:1,  
25:17  
**performance**<sup>[2]</sup> -  
71:26, 89:26  
**perhaps**<sup>[16]</sup> - 11:13,  
12:9, 13:15, 13:16,  
15:2, 29:13, 39:11,  
39:13, 40:17, 45:6,  
55:14, 84:26, 93:7,  
103:20, 106:1  
**period**<sup>[3]</sup> - 24:24,  
24:26, 40:23  
**person**<sup>[23]</sup> - 10:1,  
13:23, 15:15, 16:9,  
17:1, 30:17, 77:6,  
81:5, 85:11, 86:13,  
86:16, 86:17, 87:12,  
87:25, 94:27, 96:19,  
101:18, 101:25,  
102:25, 103:21,  
107:28, 108:29,  
114:10  
**personal**<sup>[5]</sup> - 12:23,  
13:27, 16:13, 38:24,  
43:2  
**personnel**<sup>[4]</sup> - 83:13,  
84:13, 84:16, 86:6  
**persons**<sup>[6]</sup> - 46:27,  
54:16, 74:28, 76:3,  
76:4, 84:26  
**perspective**<sup>[3]</sup> -  
36:22, 49:12, 92:6  
**pertain**<sup>[1]</sup> - 88:26  
**PETER**<sup>[3]</sup> - 1:12, 2:2,  
2:4  
**phase**<sup>[4]</sup> - 113:26,  
114:17, 114:23,  
114:25  
**phone**<sup>[13]</sup> - 8:17,  
9:10, 14:11, 17:10,  
18:9, 18:15, 18:26,  
18:27, 19:12, 19:13,  
19:14, 19:15  
**phoned**<sup>[1]</sup> - 67:2  
**physically**<sup>[2]</sup> - 83:8,  
94:9  
**pick**<sup>[1]</sup> - 39:16  
**piece**<sup>[4]</sup> - 33:18,  
37:23, 72:15, 110:25  
**PLACE**<sup>[1]</sup> - 3:2  
**place**<sup>[21]</sup> - 34:15,  
35:1, 35:9, 37:2,  
40:9, 47:4, 50:28,  
67:9, 76:16, 82:4,  
82:20, 89:12, 98:11,  
98:25, 100:23,  
104:21, 109:4,  
110:2, 110:20,  
112:28, 116:1  
**placed**<sup>[1]</sup> - 95:18  
**plan**<sup>[3]</sup> - 93:29,  
101:12, 101:15  
**planning**<sup>[1]</sup> - 64:29  
**play**<sup>[1]</sup> - 36:27  
**PLC**<sup>[1]</sup> - 3:23  
**plus**<sup>[1]</sup> - 40:13  
**point**<sup>[34]</sup> - 17:23,  
17:26, 21:8, 23:23,  
41:20, 49:15, 51:3,  
51:16, 52:25, 58:21,  
59:9, 72:27, 75:26,  
82:15, 84:27, 90:23,  
97:5, 98:18, 99:25,  
101:23, 101:27,  
101:28, 101:29,  
104:3, 105:4,  
105:15, 109:22,  
111:29, 112:3,  
113:5, 113:15,  
114:1, 114:18, 115:2  
**points**<sup>[1]</sup> - 92:24  
**policies**<sup>[9]</sup> - 71:21,  
103:14, 104:27,  
105:1, 105:5, 105:7,  
105:13, 109:6, 110:6  
**policy**<sup>[50]</sup> - 10:22,  
36:9, 70:21, 70:26,  
71:2, 71:3, 71:4,  
71:8, 79:24, 79:29,  
82:13, 82:15, 82:19,  
89:19, 89:25, 90:5,  
90:8, 91:1, 91:3,  
93:2, 95:9, 97:24,  
98:9, 100:23,  
100:24, 101:2,  
101:8, 101:24,  
102:7, 102:14,  
102:17, 102:22,  
103:1, 103:5, 103:7,  
103:17, 104:4,  
104:6, 105:16,  
105:29, 106:9,  
106:29, 107:12,  
107:13, 107:21,  
107:23, 108:3,  
108:9, 108:17, 110:1  
**populate**<sup>[1]</sup> - 21:24  
**populated**<sup>[1]</sup> - 22:24  
**posed**<sup>[1]</sup> - 99:5  
**position**<sup>[10]</sup> - 15:12,  
16:4, 37:7, 39:12,  
39:13, 40:20, 46:6,  
105:28, 105:29,  
106:15  
**possibility**<sup>[1]</sup> -  
111:28  
**possible**<sup>[9]</sup> - 13:25,  
16:11, 79:21, 80:1,  
92:3, 92:12, 98:5,  
106:2, 115:28  
**possibly**<sup>[9]</sup> - 13:8,  
17:24, 18:14, 19:9,  
20:5, 54:22, 56:16,  
74:4, 74:26  
**post**<sup>[2]</sup> - 64:15,  
103:10  
**potential**<sup>[3]</sup> - 93:9,  
111:27, 111:29  
**potentially**<sup>[2]</sup> - 86:3,  
98:2  
**power**<sup>[1]</sup> - 93:1  
**powers**<sup>[3]</sup> - 73:26,  
78:24, 92:28  
**practice**<sup>[5]</sup> - 47:11,  
68:26, 69:6, 96:2,  
98:6  
**practising**<sup>[1]</sup> - 71:14  
**practitioners**<sup>[1]</sup> -  
103:20  
**pre**<sup>[2]</sup> - 103:21,  
103:28  
**pre-meeting**<sup>[1]</sup> -  
103:21  
**pre-step**<sup>[1]</sup> - 103:28  
**predated**<sup>[1]</sup> - 100:21  
**preliminary**<sup>[10]</sup> -  
84:23, 84:24,  
112:27, 113:3,  
113:4, 113:12,  
113:17, 113:25,  
114:17, 114:24  
**prepared**<sup>[2]</sup> - 13:3,  
107:26  
**present**<sup>[9]</sup> - 40:21,  
40:23, 52:10, 55:18,  
57:10, 61:4, 62:9,  
62:16, 64:15  
**presented**<sup>[2]</sup> - 37:11,  
108:7  
**presently**<sup>[2]</sup> - 24:13,  
104:4  
**pretty**<sup>[6]</sup> - 44:5, 44:9,  
53:21, 55:11, 60:16  
**prevent**<sup>[1]</sup> - 89:11  
**previous**<sup>[7]</sup> - 7:22,  
9:21, 30:24, 67:8,  
75:18, 84:9, 84:25  
**previously**<sup>[6]</sup> - 30:7,  
37:19, 62:15, 90:24,  
95:14, 106:1  
**primarily**<sup>[1]</sup> - 61:18  
**primary**<sup>[2]</sup> - 46:1,  
78:4  
**principal**<sup>[2]</sup> - 51:7,  
111:5  
**principle**<sup>[1]</sup> - 57:20  
**principles**<sup>[4]</sup> - 20:1,  
20:3, 91:2, 96:6  
**prioritised**<sup>[1]</sup> - 80:3  
**priority**<sup>[2]</sup> - 80:22,  
91:17  
**private**<sup>[5]</sup> - 28:12,  
31:12, 31:14, 31:15,  
103:10  
**probability**<sup>[1]</sup> - 92:8  
**problem**<sup>[2]</sup> - 38:5,  
43:7  
**procedural**<sup>[2]</sup> -  
97:18, 98:10  
**procedure**<sup>[13]</sup> -  
19:21, 47:14, 83:10,  
84:14, 85:4, 85:7,  
90:5, 93:6, 97:27,  
99:3, 100:16, 108:6,  
108:25  
**Procedures**<sup>[3]</sup> - 69:3,  
84:7, 85:1  
**procedures**<sup>[22]</sup> -  
69:9, 70:22, 71:22,  
81:3, 81:4, 81:14,  
82:19, 89:19, 90:3,  
90:10, 90:20, 92:13,  
93:11, 94:11, 94:19,  
97:23, 104:22,  
105:5, 107:28,  
108:4, 110:6, 113:2  
**proceed**<sup>[10]</sup> - 98:2,  
99:20, 99:21, 99:23,  
111:17, 113:26,  
113:29, 114:17,  
115:5, 115:6  
**proceeded**<sup>[1]</sup> -  
114:22  
**proceeding**<sup>[2]</sup> -  
19:21, 114:10  
**proceedings**<sup>[1]</sup> -  
13:18  
**process**<sup>[21]</sup> - 19:8,  
47:3, 47:10, 51:23,  
54:28, 57:11, 57:16,  
65:27, 67:27, 68:25,  
83:11, 84:21, 88:28,  
90:6, 104:18,  
104:21, 106:26,  
107:19, 110:24,  
113:12, 114:6  
**processes**<sup>[1]</sup> - 81:14  
**produced**<sup>[1]</sup> - 90:26  
**production**<sup>[1]</sup> - 81:17  
**professional**<sup>[6]</sup> -  
30:21, 64:18, 76:3,  
83:13, 84:13, 97:12  
**professionals**<sup>[2]</sup> -  
82:3, 92:7  
**programme**<sup>[2]</sup> -  
42:25, 71:17  
**programmes**<sup>[2]</sup> -  
64:28, 71:9  
**progress**<sup>[2]</sup> - 62:23,  
87:24  
**progressing**<sup>[1]</sup> - 99:4  
**projects**<sup>[1]</sup> - 65:3  
**promote**<sup>[3]</sup> - 73:16,  
91:7, 97:21  
**promoted**<sup>[5]</sup> - 25:2,  
25:5, 25:16, 25:19,  
25:20  
**promoting**<sup>[1]</sup> - 74:3  
**promotional**<sup>[2]</sup> -  
74:12, 93:3  
**proper**<sup>[1]</sup> - 82:18  
**properly**<sup>[1]</sup> - 113:8  
**proportionate**<sup>[1]</sup> -  
50:16  
**proposed**<sup>[1]</sup> - 66:8  
**proposing**<sup>[1]</sup> - 56:14  
**prosecute**<sup>[1]</sup> - 111:14  
**prosecution**<sup>[2]</sup> -  
56:11, 111:2  
**protect**<sup>[4]</sup> - 73:9,  
78:5, 82:1, 88:18  
**PROTECTED**<sup>[2]</sup> - 1:3,  
1:4  
**Protection**<sup>[1]</sup> - 6:24  
**protection**<sup>[32]</sup> - 7:6,  
10:22, 12:17, 13:22,  
17:4, 18:21, 20:2,  
20:3, 20:4, 71:15,  
72:17, 73:17, 73:19,  
73:21, 76:4, 77:15,  
77:19, 77:23, 77:24,  
79:2, 79:13, 79:18,  
80:3, 81:7, 81:8,  
81:18, 81:25, 82:9,  
91:8, 92:5, 109:1,  
111:25  
**protective**<sup>[7]</sup> - 56:9,  
74:29, 91:20, 91:27,  
93:9, 93:29, 101:14  
**protocol**<sup>[2]</sup> - 82:25,  
88:6  
**provide**<sup>[11]</sup> - 8:21,  
49:10, 49:19, 49:26,  
50:15, 50:28, 51:5,  
71:6, 71:25, 73:18,  
104:2  
**provided**<sup>[18]</sup> - 7:11,  
10:23, 12:18, 17:17,  
20:14, 22:17, 50:8,  
51:26, 53:23, 58:7,  
59:4, 67:5, 67:16,  
67:19, 67:20, 72:18,

105:6, 106:21  
**provides** [4] - 9:3,  
 73:14, 88:9, 94:6  
**providing** [3] - 20:22,  
 60:12, 68:5  
**provision** [1] - 77:22  
**provisional** [3] -  
 101:23, 101:25,  
 104:13  
**provisions** [2] - 90:18,  
 97:17  
**proximate** [1] - 56:27  
**public** [2] - 18:24,  
 46:12  
**purely** [2] - 62:7,  
 62:16  
**purpose** [2] - 49:9,  
 80:22  
**purposefully** [1] -  
 17:27  
**pursued** [2] - 15:1,  
 15:5  
**put** [7] - 13:6, 17:27,  
 36:5, 36:22, 37:13,  
 52:15, 92:16  
**puts** [2] - 77:2, 109:20  
**putting** [2] - 19:14,  
 109:15

## Q

**qualifications** [2] -  
 64:19, 71:13  
**qualified** [1] - 64:20  
**quality** [3] - 64:27,  
 80:18  
**quarter** [1] - 18:4  
**QUAY** [1] - 2:17  
**query** [2] - 12:12,  
 22:20  
**QUESTIONED** [2] -  
 5:12, 43:9  
**questions** [19] - 15:18,  
 15:19, 15:20, 20:27,  
 31:2, 36:26, 39:7,  
 41:25, 48:9, 60:3,  
 62:20, 65:2, 70:5,  
 70:6, 70:7, 105:16,  
 105:19, 106:3,  
 110:16  
**quick** [1] - 20:28  
**quickly** [2] - 17:22,  
 19:15  
**QUINLAN** [5] - 5:21,  
 70:14, 105:22,  
 110:11, 115:12  
**Quinlan** [7] - 63:2,  
 70:12, 70:25, 89:19,  
 105:20, 105:24,

110:13  
**Quinlan's** [1] - 70:17  
**QUINN** [1] - 3:26  
**quite** [6] - 7:24, 19:15,  
 20:18, 29:25, 63:1,  
 97:18  
**quote** [1] - 13:13

## R

**rank** [2] - 25:3, 25:5  
**rate** [1] - 76:29  
**ratio** [1] - 74:20  
**re** [3] - 8:29, 45:12,  
 84:14  
**RE** [4] - 5:11, 5:25,  
 41:29, 115:12  
**RE-EXAMINED** [4] -  
 5:11, 5:25, 41:29,  
 115:12  
**re-notification** [1] -  
 84:14  
**re-open** [1] - 45:12  
**reach** [1] - 92:21  
**reactivating** [1] -  
 115:2  
**read** [8] - 9:24, 11:13,  
 12:14, 13:17, 26:12,  
 33:25, 33:27, 47:16  
**reads** [3] - 11:21,  
 47:27, 55:25  
**realise** [1] - 29:4  
**really** [11] - 18:20,  
 21:10, 32:16, 33:23,  
 36:11, 40:12, 41:3,  
 44:6, 45:15, 67:26,  
 69:24  
**reason** [4] - 18:12,  
 33:8, 39:3, 93:19  
**reasonable** [2] -  
 23:23, 92:15  
**reasons** [2] - 36:12,  
 110:28  
**receipt** [4] - 9:23,  
 13:19, 86:10, 86:19  
**received** [11] - 23:1,  
 23:10, 26:10, 27:29,  
 29:28, 31:9, 80:2,  
 81:15, 84:8, 96:15,  
 112:18  
**receives** [1] - 93:15  
**receiving** [2] - 65:15,  
 91:8  
**recent** [1] - 110:29  
**reckoned** [1] - 21:15  
**recognition** [1] -  
 97:20  
**recollect** [1] - 58:20  
**recollection** [4] - 57:6,

59:24, 61:25, 62:6  
**recommendation** [2] -  
 103:27, 104:4  
**recommended** [1] -  
 104:1  
**reconvenced** [1] - 35:9  
**record** [24] - 13:17,  
 23:9, 23:17, 23:26,  
 35:24, 37:10, 45:15,  
 53:26, 54:17, 54:27,  
 55:1, 55:2, 80:7,  
 80:27, 81:28, 82:8,  
 82:13, 82:21, 87:18,  
 108:26, 111:19,  
 112:5, 112:9, 112:19  
**record-keeping** [5] -  
 81:28, 82:8, 82:13,  
 82:21, 108:26  
**recorded** [8] - 10:27,  
 11:26, 37:10, 37:13,  
 38:29, 39:2, 55:16,  
 79:20  
**records** [9] - 8:6,  
 51:21, 81:29, 82:3,  
 84:9, 84:25, 113:10,  
 113:13, 114:21  
**recovery** [1] - 21:11  
**rectified** [2] - 68:8,  
 68:9  
**REDMOND** [1] - 2:24  
**reduce** [1] - 50:26  
**reductions** [1] - 80:27  
**refer** [5] - 27:14,  
 71:27, 74:14, 75:11,  
 113:9  
**reference** [9] - 7:12,  
 18:28, 20:5, 69:22,  
 82:7, 82:12, 97:5,  
 106:6  
**references** [1] - 41:5  
**referral** [14] - 34:3,  
 37:15, 50:28, 51:23,  
 52:21, 61:12, 79:15,  
 79:27, 84:8, 84:20,  
 84:21, 96:19,  
 110:28, 113:2  
**referrals** [3] - 79:25,  
 81:15, 81:20  
**referred** [8] - 16:19,  
 16:20, 33:10, 46:23,  
 55:6, 56:2, 107:25,  
 114:19  
**referring** [5] - 19:20,  
 22:12, 23:4, 43:25,  
 54:4  
**refers** [6] - 10:5,  
 51:27, 59:11, 79:7,  
 81:11, 94:5  
**reflect** [1] - 71:10  
**reflects** [1] - 93:3

**refusal** [1] - 98:27  
**refused** [1] - 23:7  
**refuses** [3] - 99:2,  
 99:10, 104:7  
**regard** [15] - 16:4,  
 46:9, 71:21, 72:13,  
 77:3, 82:18, 85:21,  
 88:7, 91:9, 94:22,  
 99:7, 105:13,  
 106:14, 107:8,  
 108:20  
**regarded** [1] - 96:2  
**regarding** [4] - 9:5,  
 9:17, 86:2, 114:8  
**region** [1] - 46:2  
**Region** [4] - 24:15,  
 25:14, 35:13, 35:15  
**regional** [7] - 6:14,  
 7:1, 32:16, 32:28,  
 35:18, 35:21, 38:25  
**register** [1] - 42:29  
**registered** [1] - 103:10  
**REGISTRAR** [1] - 2:4  
**registration** [1] -  
 71:18  
**regular** [2] - 24:28,  
 42:27  
**reinforced** [1] - 44:21  
**reinvigorated** [1] -  
 112:16  
**relate** [3] - 73:27,  
 110:4, 111:27  
**related** [4] - 7:26,  
 10:26, 32:23, 77:18  
**relates** [3] - 55:29,  
 60:29, 95:11  
**relating** [5] - 8:10,  
 30:26, 31:16, 58:24,  
 58:27  
**relation** [130] - 7:13,  
 7:14, 8:14, 9:28,  
 15:4, 21:18, 23:22,  
 26:9, 26:17, 26:20,  
 26:25, 27:3, 29:25,  
 32:2, 32:3, 33:7,  
 42:13, 42:15, 43:29,  
 44:16, 45:13, 50:6,  
 54:16, 54:17, 55:2,  
 58:13, 58:14, 58:29,  
 59:4, 59:14, 59:19,  
 60:13, 61:22, 62:14,  
 66:9, 69:14, 71:7,  
 71:13, 71:26, 72:27,  
 73:2, 74:2, 74:4,  
 74:8, 74:23, 75:1,  
 76:4, 77:27, 78:15,  
 79:8, 79:15, 80:7,  
 80:8, 80:19, 80:24,  
 80:27, 81:14, 81:20,  
 82:13, 82:14, 83:27,

84:1, 84:3, 84:5,  
 84:10, 84:11, 84:20,  
 84:23, 84:27, 85:7,  
 86:29, 88:25, 89:25,  
 89:27, 90:1, 90:2,  
 90:3, 90:6, 90:8,  
 90:11, 90:19, 90:29,  
 92:11, 93:4, 93:12,  
 95:15, 95:21, 96:4,  
 96:7, 97:20, 99:17,  
 99:29, 100:4,  
 101:13, 101:20,  
 102:15, 102:19,  
 103:2, 103:14,  
 103:25, 104:12,  
 104:23, 105:4,  
 105:7, 105:16,  
 106:5, 106:8,  
 106:28, 107:5,  
 107:23, 107:27,  
 108:3, 108:8,  
 108:26, 108:28,  
 109:1, 109:5, 109:8,  
 109:13, 109:26,  
 110:2, 111:25,  
 111:29, 112:1,  
 113:3, 113:7,  
 113:16, 114:8,  
 114:16  
**relationship** [1] -  
 61:20  
**relatively** [1] - 63:2  
**released** [2] - 13:24,  
 16:10  
**relevance** [1] - 100:29  
**relevant** [17] - 6:18,  
 38:10, 41:5, 65:6,  
 74:28, 83:13, 84:13,  
 84:15, 84:26, 91:26,  
 93:8, 96:12, 98:3,  
 101:22, 101:28,  
 113:20  
**reliability** [2] - 97:13,  
 100:12  
**relying** [1] - 43:20  
**remainder** [1] - 12:21  
**remaining** [1] - 62:29  
**remember** [6] - 13:3,  
 51:12, 52:3, 58:16,  
 69:23, 69:28  
**reminders** [1] - 43:1  
**remit** [2] - 66:19,  
 67:27  
**remove** [2] - 11:18,  
 68:14  
**repeat** [2] - 21:22,  
 86:18  
**replace** [2] - 21:17,  
 75:15  
**replied** [2] - 47:7,

68:22  
**reply** [2] - 13:17, 26:14  
**report** [104] - 7:27, 8:1, 8:3, 8:10, 8:26, 8:29, 9:5, 9:20, 10:7, 10:9, 10:20, 10:23, 11:3, 11:5, 11:18, 11:27, 12:3, 12:5, 12:14, 12:18, 12:19, 12:21, 12:28, 13:3, 13:4, 13:5, 13:21, 14:7, 14:8, 14:13, 14:17, 15:29, 16:16, 16:18, 16:19, 16:20, 16:29, 17:2, 17:15, 17:25, 18:12, 19:1, 19:5, 19:7, 19:11, 19:18, 19:24, 19:27, 20:18, 20:19, 21:15, 21:16, 21:17, 21:19, 21:20, 22:2, 22:5, 22:16, 22:19, 22:25, 30:5, 30:12, 33:26, 42:21, 46:19, 59:4, 66:1, 66:3, 66:6, 66:9, 66:14, 66:22, 66:25, 67:1, 67:5, 67:9, 67:13, 67:14, 67:16, 67:19, 67:20, 67:22, 68:4, 68:6, 68:13, 68:15, 68:16, 68:20, 69:12, 69:15, 69:26, 77:8, 80:2, 93:16, 95:1, 96:15, 96:16, 96:17, 98:16, 100:5, 115:17  
**reported** [6] - 9:18, 18:20, 79:18, 81:4, 82:4, 93:18  
**reporters** [1] - 18:23  
**reports** [6] - 13:9, 13:10, 13:12, 14:3, 68:1, 93:25  
**represent** [3] - 21:5, 60:9, 105:25  
**representations** [2] - 92:17, 92:20  
**represented** [1] - 104:9  
**request** [6] - 26:27, 27:2, 28:8, 38:25, 42:20, 43:5  
**requested** [16] - 10:22, 24:29, 25:17, 26:28, 26:29, 28:9, 29:23, 32:18, 33:1, 34:16, 38:27, 38:28, 39:1, 39:4, 39:5, 47:2  
**requesting** [2] - 34:24, 61:19  
**requests** [1] - 65:2  
**require** [2] - 35:25, 57:14  
**required** [9] - 32:13, 32:24, 33:4, 34:19, 53:29, 54:9, 91:6, 112:26, 113:14  
**requirement** [6] - 84:8, 89:29, 95:12, 103:20, 105:8, 113:1  
**requirements** [1] - 98:14  
**requires** [1] - 42:26  
**Research** [1] - 6:24  
**research** [1] - 7:6  
**reside** [1] - 86:3  
**resides** [2] - 85:26, 85:27  
**resolution** [1] - 88:4  
**RESOLUTIONS** [1] - 1:5  
**resolve** [2] - 8:13, 9:12  
**resource** [3] - 80:12, 80:14, 113:16  
**resources** [1] - 80:25  
**respect** [19] - 14:15, 18:6, 61:21, 65:12, 66:2, 85:15, 90:4, 93:9, 95:17, 95:28, 99:20, 99:23, 102:25, 103:7, 104:24, 106:29, 107:4, 107:24, 115:4  
**respective** [2] - 88:27, 111:23  
**respond** [2] - 56:7, 80:10  
**responded** [2] - 70:2, 80:4  
**responding** [4] - 70:22, 82:14, 89:20, 93:11  
**response** [7] - 16:7, 36:26, 50:16, 53:6, 80:3, 101:20  
**responsibilities** [8] - 46:9, 73:3, 74:1, 74:12, 77:29, 88:27, 111:23, 111:25  
**responsibility** [12] - 19:28, 46:13, 72:3, 72:7, 72:12, 74:25, 74:27, 78:5, 78:8, 97:29, 109:29  
**responsible** [3] - 17:1, 64:26, 71:2  
**rest** [2] - 12:20, 17:15  
**resulted** [1] - 110:3  
**RESUMED** [1] - 6:1  
**retained** [4] - 12:4, 14:13, 25:6, 85:15  
**retired** [1] - 25:21  
**retrieve** [6] - 11:27, 13:12, 14:3, 17:25, 18:12, 67:8  
**retrieved** [1] - 12:27  
**retrospective** [14] - 76:8, 77:4, 77:7, 86:1, 94:22, 94:25, 95:12, 95:24, 96:15, 97:21, 97:29, 99:18, 100:5, 112:18  
**return** [7] - 11:23, 14:13, 18:27, 23:8, 23:16, 48:26, 67:14  
**returned** [2] - 14:9, 111:1  
**retypes** [1] - 109:20  
**revealed** [1] - 76:24  
**revert** [1] - 88:2  
**review** [24] - 47:3, 47:11, 52:5, 52:10, 52:24, 53:16, 53:28, 54:20, 55:21, 59:20, 61:4, 68:26, 69:4, 80:19, 101:5, 103:18, 103:19, 103:27, 104:4, 106:7, 108:15, 108:17, 108:18, 115:14  
**reviewed** [3] - 21:28, 53:7, 54:28  
**Reviewer** [1] - 6:23  
**reviewing** [11] - 22:10, 51:7, 52:1, 52:23, 54:10, 55:28, 57:6, 57:9, 60:21, 60:24, 106:27  
**reviews** [2] - 7:5, 81:8  
**revise** [1] - 116:3  
**Rian** [8] - 8:28, 8:29, 11:23, 11:25, 13:20, 14:27, 66:3, 69:20  
**rigour** [1] - 108:10  
**ring** [1] - 44:3  
**ringing** [1] - 43:16  
**risk** [30] - 64:27, 73:28, 74:2, 74:5, 74:9, 74:21, 74:23, 74:26, 76:23, 81:8, 86:3, 91:13, 91:14, 91:17, 91:24, 93:4, 93:5, 93:9, 93:20, 93:21, 93:27, 97:7, 97:8, 98:2, 98:3, 98:7, 99:4, 111:7, 111:27, 111:29  
**robust** [4] - 47:15, 47:16, 68:27, 69:2  
**role** [13] - 7:1, 32:16, 32:27, 37:9, 38:23, 45:14, 61:22, 62:14, 65:5, 75:4, 78:14, 106:9, 108:16  
**roles** [3] - 6:28, 72:11, 77:28  
**room** [7] - 41:1, 55:3, 55:6, 55:7, 55:8, 55:10, 61:6  
**ROSALIE** [2] - 5:3, 6:10  
**Rosalie** [3] - 6:7, 8:10, 46:15  
**ROSSA** [1] - 4:1  
**rough** [1] - 33:24  
**routine** [5] - 8:19, 15:3, 18:22, 66:17  
**RTE** [1] - 3:4  
**running** [2] - 25:24, 26:1  
**RYAN** [2] - 3:17, 3:18

**S**

**safe** [1] - 82:4  
**safety** [3] - 91:21, 92:4, 93:21  
**SAINT** [2] - 2:12, 4:4  
**SARAH** [1] - 2:27  
**SART** [1] - 109:23  
**sat** [1] - 61:6  
**satisfy** [1] - 84:15  
**saw** [1] - 52:18  
**SC** [14] - 2:6, 2:6, 2:9, 2:14, 2:15, 2:18, 2:19, 2:23, 2:27, 3:4, 3:6, 3:8, 3:16, 4:1  
**SCANLON** [1] - 2:24  
**schedule** [2] - 62:25, 115:26  
**scheduled** [2] - 35:1, 35:8  
**school** [1] - 75:8  
**scrap** [1] - 33:23  
**screen** [5] - 8:6, 11:4, 47:6, 65:21, 76:10  
**scribble** [1] - 33:18  
**se** [1] - 27:24  
**Seamus** [4] - 51:6, 52:20, 53:4, 55:27  
**SEAN** [3] - 2:16, 2:24, 3:4  
**SEANAD** [1] - 1:6  
**second** [12] - 66:6, 70:18, 70:21, 83:21, 83:25, 84:19, 84:22, 89:5, 89:18, 102:3, 102:6, 114:13  
**secondary** [1] - 75:8  
**secretary** [1] - 28:12  
**section** [7] - 73:3, 73:13, 77:14, 77:26, 93:1, 98:27, 110:26  
**sections** [1] - 79:11  
**see** [9] - 32:9, 36:21, 40:25, 45:16, 47:8, 47:29, 58:6, 61:5, 106:23  
**seek** [6] - 42:4, 42:21, 65:7, 74:25, 101:20, 101:26  
**seeking** [3] - 42:19, 95:26  
**seeks** [1] - 77:14  
**seem** [1] - 109:15  
**selected** [1] - 53:18  
**selecting** [1] - 58:23  
**send** [9] - 28:9, 28:22, 29:21, 29:29, 30:5, 33:4, 39:1, 39:3, 103:15  
**sending** [7] - 18:4, 28:15, 28:17, 28:26, 32:10, 56:17, 103:28  
**sends** [2] - 85:11, 109:19  
**senior** [2] - 106:11, 109:9  
**sense** [9] - 33:9, 38:9, 39:14, 39:16, 40:15, 40:24, 43:15, 51:25, 114:12  
**sensible** [1] - 23:28  
**sent** [36] - 7:14, 9:8, 10:8, 10:15, 10:27, 12:28, 21:25, 22:23, 22:26, 22:28, 23:18, 24:27, 27:2, 28:3, 28:11, 29:27, 32:20, 33:9, 34:22, 37:15, 43:27, 47:24, 55:12, 55:16, 56:11, 56:21, 65:10, 65:23, 66:10, 66:27, 67:12, 83:21, 85:14, 103:9, 109:23  
**sentence** [1] - 11:16  
**separate** [2] - 72:21, 85:14  
**September** [4] - 89:21, 90:13, 90:16, 90:19  
**sequence** [1] - 22:22  
**Sergeant** [22] - 8:2, 9:29, 15:25, 30:27, 31:7, 35:6, 37:1,

39:18, 39:20, 39:24, 41:10, 58:11, 58:19, 59:14, 59:19, 60:9, 61:24, 105:25, 112:4, 114:3, 114:28, 115:8

**sergeant** [8] - 25:3, 25:4, 26:6, 29:19, 35:19, 43:23, 44:11

**series** [2] - 75:2, 80:17

**serious** [8] - 19:1, 32:2, 32:8, 32:13, 33:5, 34:4, 91:16, 91:24

**serious/could** [1] - 12:6

**seriously** [1] - 18:19

**service** [32] - 6:18, 6:19, 8:11, 9:1, 9:6, 10:5, 10:16, 10:21, 14:4, 14:9, 14:19, 14:29, 15:4, 46:1, 46:6, 46:13, 46:20, 50:13, 51:20, 52:16, 53:1, 53:9, 53:14, 53:19, 59:5, 61:12, 66:23, 67:2, 67:6, 67:14, 71:12, 82:24

**Service** [9] - 8:20, 8:28, 13:20, 14:5, 14:8, 14:28, 68:12, 68:19, 72:8

**Services** [3] - 1:25, 9:9, 79:19

**SERVICES** [1] - 1:30

**services** [21] - 10:8, 46:10, 46:11, 49:10, 49:20, 49:27, 52:22, 64:21, 64:22, 64:23, 65:1, 72:17, 72:19, 72:23, 72:25, 72:28, 78:21, 78:24, 79:1, 79:3, 106:2

**servicing** [2] - 32:23, 33:11

**set** [15] - 64:18, 66:8, 83:10, 89:14, 91:3, 91:4, 92:17, 93:29, 94:5, 94:12, 94:19, 102:15, 102:28, 103:1, 108:28

**sets** [12] - 77:28, 85:19, 86:8, 93:10, 94:17, 96:14, 98:29, 102:8, 102:10, 103:9, 104:6, 104:17

**seven** [1] - 56:13

**seven-year-old** [1] - 56:13

**severely** [1] - 82:2

**sexual** [1] - 34:4

**sexually** [2] - 83:8, 94:9

**SGT** [1] - 2:14

**shall** [2] - 73:5, 73:16

**share** [5] - 74:27, 98:3, 101:24, 101:28, 108:6

**shared** [1] - 102:20

**sharing** [3] - 88:26, 93:7, 98:6

**SHATTER** [2] - 3:1, 3:1

**sheet** [1] - 110:18

**Sheridan** [8] - 28:1, 28:15, 29:16, 30:13, 31:10, 34:11, 34:16, 43:26

**Sheridan's** [2] - 30:5, 33:26

**SHIP** [1] - 2:21

**short** [6] - 20:15, 20:18, 63:1, 63:2, 68:22, 88:21

**showed** [1] - 36:1

**shred** [5] - 11:19, 23:8, 23:16, 67:8, 68:15

**shredded** [1] - 14:6

**shredding** [2] - 14:6, 14:9

**side** [1] - 45:12

**sign** [1] - 33:21

**signed** [11] - 27:1, 28:9, 28:22, 28:27, 29:26, 29:27, 32:11, 32:20, 34:22, 48:3, 56:21

**significance** [3] - 40:8, 40:18, 87:3

**significant** [1] - 107:22

**significantly** [1] - 18:19

**signs** [1] - 47:19

**simply** [5] - 43:19, 52:24, 62:7, 65:26, 69:19

**single** [1] - 80:21

**sit** [3] - 6:13, 115:29, 116:2

**situation** [3] - 80:9, 81:9, 83:20

**situations** [1] - 104:10

**six** [2] - 18:5, 85:7

**six-step** [1] - 85:7

**slight** [1] - 69:2

**slightly** [3] - 7:17, 28:14, 101:16

**Sligo** [12] - 24:15, 24:27, 24:28, 25:7, 34:14, 35:4, 35:9, 35:15, 36:1, 37:22, 39:28, 46:2

**Sligo-Leitrim** [1] - 46:2

**small** [1] - 27:27

**smaller** [1] - 40:11

**Smith** [2] - 47:24, 65:23

**SMYTH** [4] - 5:3, 6:10, 15:22, 21:1

**Smyth** [3] - 6:8, 6:13, 46:15

**SMYTH-LYNCH** [4] - 5:3, 6:10, 15:22, 21:1

**Smyth-Lynch** [3] - 6:8, 6:13, 46:15

**Social** [3] - 9:8, 13:11, 88:2

**social** [49] - 10:8, 10:15, 10:21, 11:28, 13:11, 14:4, 14:19, 17:24, 18:11, 22:4, 48:23, 48:27, 49:2, 49:9, 49:11, 49:20, 50:13, 51:7, 54:12, 64:16, 66:23, 67:2, 67:6, 67:7, 71:14, 71:16, 71:18, 75:13, 85:16, 87:6, 87:11, 87:17, 88:1, 88:29, 92:7, 94:19, 95:3, 96:3, 96:14, 96:25, 97:10, 98:18, 98:21, 99:3, 99:6, 99:15, 104:26, 111:5, 111:7

**SOLE** [2] - 1:12, 2:2

**solely** [2] - 37:9, 40:12

**SOLICITOR** [5] - 2:7, 3:5, 3:13, 3:23, 3:29

**solicitor** [1] - 62:12

**SOLICITOR'S** [1] - 2:20

**solicitors** [1] - 61:24

**SOLICITORS** [6] - 2:11, 3:1, 3:7, 3:20, 3:26, 4:2

**someone** [2] - 86:28, 109:6

**sometimes** [1] - 86:29

**soon** [3] - 67:6, 79:21, 80:1

**SOP** [2] - 47:13, 71:7

**SOPs** [1] - 68:26

**SOPs..** [1] - 47:11

**sorry** [7] - 14:22, 22:27, 25:18, 63:4, 83:22, 86:18, 112:11

**sort** [4] - 19:4, 19:13, 31:19, 57:11

**sought** [2] - 36:22, 36:26

**source** [1] - 80:29

**southeast** [2] - 68:13, 68:17

**special** [1] - 65:3

**specialist** [1] - 71:6

**specially** [1] - 34:26

**specific** [22] - 59:1, 71:8, 72:12, 72:15, 78:25, 78:27, 80:20, 84:1, 90:4, 90:9, 90:18, 92:27, 97:17, 97:22, 98:10, 103:22, 105:16, 106:8, 108:18, 115:15, 115:18

**specifically** [9] - 41:18, 58:16, 58:17, 59:2, 59:21, 77:5, 81:11, 94:22, 95:11

**specifics** [1] - 79:8

**spend** [1] - 79:25

**St** [1] - 64:21

**staff** [12] - 26:5, 49:9, 50:3, 71:25, 71:27, 81:20, 82:17, 90:14, 104:29, 105:2, 105:3, 105:6

**stage** [27] - 29:4, 37:22, 38:21, 42:20, 50:6, 52:28, 60:1, 67:18, 90:27, 97:3, 98:20, 98:22, 98:24, 98:28, 99:10, 102:3, 102:5, 102:6, 102:10, 102:16, 107:19, 112:16, 112:21, 114:23, 115:3, 115:16

**stages** [3] - 84:21, 104:17, 104:21

**stand** [1] - 33:17

**Standard** [3] - 69:3, 84:7, 85:1

**standard** [12] - 47:14, 67:20, 69:6, 81:3, 81:14, 85:12, 85:14, 86:10, 86:19, 89:13, 100:23, 113:1

**stark** [2] - 44:9

**start** [1] - 114:7

**STATE** [1] - 2:20

**statement** [21] - 13:13, 17:18, 24:11, 35:26, 35:29, 36:19, 37:9, 37:18, 48:16, 51:26, 53:26, 54:5, 57:11, 70:17, 70:19, 89:29, 94:29, 95:2, 98:17, 107:25, 113:17

**statements** [1] - 78:10

**station** [5] - 35:1, 40:12, 85:24, 86:5, 86:14

**Station** [4] - 24:16, 24:23, 24:27, 24:28

**stationed** [3] - 35:3, 35:4, 35:6

**stations** [1] - 39:14

**status** [2] - 80:23, 97:4

**statutory** [11] - 7:4, 7:7, 72:3, 72:7, 73:2, 73:26, 74:6, 77:22, 92:28, 93:1

**stems** [1] - 78:4

**stenographic** [1] - 1:27

**STENOGRAPHY** [1] - 1:30

**stenography** [1] - 1:25

**step** [16] - 44:23, 68:18, 85:7, 88:21, 88:29, 95:6, 95:18, 96:10, 101:16, 102:8, 103:28, 114:12, 114:13, 114:27, 114:28, 115:6

**steps** [17] - 8:12, 9:11, 66:8, 66:13, 66:28, 67:23, 69:24, 84:10, 84:28, 96:8, 98:10, 99:24, 100:4, 104:6, 108:7, 108:11, 109:7

**still** [5] - 14:13, 14:24, 93:1, 99:19, 99:22

**stills** [1] - 50:21

**stood** [1] - 59:21

**stop** [2] - 41:21, 83:19

**story** [1] - 97:2

**straight** [1] - 33:9

**strange** [1] - 38:21

**strategic** [2] - 71:9, 71:10

**strategy** [3] - 70:26, 81:7, 82:16

**STREET** [6] - 2:12, 2:21, 2:25, 3:11, 3:27, 4:3

**stressed** [1] - 81:26

**strictly** [2] - 103:10, 103:11

**strong** [1] - 28:19

**structures** [1] - 72:26

**stuff** [1] - 43:1

- subject** [3] - 103:17, 106:6
- submission** [1] - 92:16
- subordinate** [1] - 35:17
- subsequent** [2] - 19:6, 19:11
- subsequently** [5] - 18:18, 42:8, 42:21, 47:1, 59:27
- successfully** [1] - 52:19
- sufficient** [4] - 13:26, 16:12, 88:15, 89:3
- suggest** [2] - 17:26, 106:23
- suggested** [1] - 29:10
- suggesting** [6] - 32:12, 33:8, 37:6, 60:27, 107:15, 108:21
- suggestion** [1] - 41:14
- suggests** [2] - 17:20, 60:27
- sully** [1] - 39:20
- summary** [3] - 9:3, 74:24, 79:10
- summer** [1] - 56:24
- SUNLIGHT** [1] - 3:10
- superfluous** [1] - 69:27
- Superintendent** [13] - 27:29, 28:13, 28:15, 29:16, 30:5, 30:13, 31:10, 33:26, 34:11, 34:16, 34:17, 34:24, 43:26
- superintendent** [10] - 19:19, 26:10, 34:23, 85:13, 85:21, 85:23, 86:11, 86:22, 86:27, 87:22
- superintendent's** [2] - 23:2, 26:22
- superintendents** [2] - 35:23, 35:24
- superior** [2] - 61:19, 100:3
- supervisory** [1] - 6:28
- supplemental** [1] - 90:26
- support** [9] - 49:3, 50:9, 53:6, 59:10, 60:12, 73:16, 73:17, 103:24, 103:25
- suppose** [84] - 14:26, 33:23, 47:16, 49:28, 50:13, 52:16, 52:18, 53:24, 61:18, 71:5, 72:17, 72:19, 72:21, 74:1, 74:10, 74:11, 74:25, 76:2, 77:7, 77:16, 78:13, 80:6, 80:7, 80:16, 80:17, 80:23, 80:27, 84:9, 84:12, 84:20, 85:1, 86:2, 86:27, 87:1, 87:4, 88:23, 88:25, 89:25, 89:27, 90:1, 90:20, 90:22, 90:24, 90:25, 93:2, 93:3, 93:6, 93:7, 95:11, 95:13, 95:15, 95:19, 96:3, 96:5, 97:18, 97:19, 98:9, 98:11, 101:19, 101:21, 102:17, 102:18, 103:19, 105:28, 106:21, 107:1, 107:3, 108:13, 108:14, 109:26, 109:28, 109:29, 110:1, 111:22, 111:24, 111:27, 113:5, 114:6, 114:9, 114:16, 115:1, 115:5
- supposed** [1] - 71:24
- SUPREME** [2] - 1:13, 2:3
- SUPT** [1] - 3:8
- surname** [4] - 12:19, 13:23, 16:9, 16:23
- surprise** [1] - 7:24
- surprised** [2] - 7:17, 7:22
- suspect** [1] - 113:5
- suspected** [7] - 21:21, 21:26, 22:29, 23:18, 78:6, 78:15, 84:2
- suspecting** [1] - 83:12
- suspects** [2] - 83:7, 94:8
- Sweeney** [1] - 111:5
- switch** [1] - 15:26
- SWORN** [6] - 6:10, 24:8, 45:27, 48:19, 64:5, 70:14
- system** [3] - 42:12, 42:15, 42:26
- systems** [2] - 47:15, 68:27
- Séamus** [1] - 100:3
- Sióchána** [38] - 14:4, 22:29, 24:19, 24:20, 27:8, 30:15, 37:16, 39:17, 58:25, 59:1, 77:29, 78:3, 78:7, 78:9, 78:20, 78:23, 78:27, 79:1, 81:6, 82:25, 83:3, 83:9, 83:17, 85:5, 85:8, 88:17, 94:5, 94:10, 94:27, 94:28, 95:2, 95:3, 96:22, 98:15, 98:18, 108:25, 109:21, 110:16
- Sióchána's** [1] - 23:2
- 
- ## T
- 
- task** [1] - 97:10
- tasks** [1] - 42:14
- TAYLOR** [1] - 3:8
- Team** [1] - 88:2
- team** [7] - 29:3, 51:7, 89:1, 104:26, 106:11, 110:28, 111:6
- technically** [1] - 100:18
- telephone** [5] - 14:19, 14:24, 18:17, 20:15, 25:25
- template** [1] - 102:20
- templates** [1] - 89:13
- ten** [1] - 36:12
- TEN** [1] - 2:28
- terms** [15] - 7:11, 28:19, 30:21, 31:21, 37:21, 40:15, 40:18, 42:19, 43:2, 45:11, 62:25, 71:12, 104:25, 106:6, 111:26
- TERRACE** [2] - 2:28, 3:21
- terrible** [2] - 44:7, 44:8
- Terry** [1] - 55:27
- testified** [1] - 106:18
- text** [2] - 13:15, 60:16
- textbooks** [1] - 41:5
- that** [1] - 33:21
- THE** [21] - 1:4, 1:8, 1:9, 1:12, 2:3, 2:6, 2:18, 2:23, 3:19, 5:12, 6:1, 24:3, 43:9, 45:22, 48:13, 62:27, 63:7, 64:1, 70:9, 115:23, 116:7
- themselves** [1] - 72:20
- THEN** [8] - 24:3, 45:22, 48:13, 62:27, 63:7, 70:9, 115:23, 116:7
- therapist** [2] - 9:11, 67:2
- thereafter** [1] - 42:10
- therefore** [5] - 13:25, 16:11, 50:26, 77:17, 111:14
- they've** [1] - 44:5
- thinking** [4] - 13:4, 20:1, 38:11, 50:14
- third** [4] - 91:26, 93:8, 101:12, 104:15
- THOMAS** [1] - 2:9
- three** [2] - 19:12, 26:4
- thrust** [1] - 45:11
- THURSDAY** [1] - 116:7
- tidy** [2] - 18:15, 42:11
- Time** [1] - 42:25
- timely** [1] - 80:11
- TIMES** [1] - 3:19
- tired** [2] - 63:4
- TO** [1] - 116:7
- today** [3] - 55:29, 62:29, 115:26
- together** [3] - 52:5, 61:2, 69:11
- tomorrow** [2] - 115:27, 115:29
- took** [7] - 35:26, 36:17, 37:2, 49:2, 76:16, 104:21, 110:19
- tools** [1] - 71:22
- top** [1] - 16:7
- total** [1] - 19:12
- totally** [1] - 38:9
- touched** [1] - 111:1
- traffic** [1] - 24:25
- Trainer** [1] - 6:21
- training** [5] - 8:22, 24:21, 55:6, 55:7, 105:6
- Training** [1] - 6:21
- tranche** [1] - 52:6
- transcript** [1] - 1:26
- transcripts** [1] - 26:13
- transferred** [3] - 64:22, 64:24, 72:29
- transparency** [1] - 104:23
- transparent** [2] - 98:5, 98:9
- trawling** [1] - 53:20
- treated** [1] - 107:29
- TRIBUNAL** [2] - 1:3, 2:6
- Tribunal** [28] - 9:27, 21:28, 22:10, 25:22, 27:4, 42:8, 45:10, 51:16, 51:26, 59:3, 64:8, 64:19, 65:16, 69:10, 71:1, 72:11, 75:12, 76:13, 95:22, 100:1, 105:26, 106:12, 106:21, 107:3, 107:6, 107:26, 108:5, 108:19
- Tribunal's** [4] - 55:15, 75:24, 96:13, 105:12
- TRIBUNALS** [1] - 1:9
- tried** [2] - 9:26, 12:15
- Trinity** [1] - 71:17
- true** [4] - 16:4, 36:11, 107:1
- truthful** [1] - 19:23
- try** [11] - 17:29, 74:25, 80:10, 95:19, 96:3, 96:5, 96:6, 98:1, 98:4, 103:22, 116:1
- trying** [2] - 57:23, 80:15
- turn** [7] - 62:7, 62:11, 62:12, 76:6, 77:9, 81:23, 85:4
- turned** [1] - 62:17
- Tusla** [14] - 12:1, 22:4, 22:12, 22:28, 23:11, 34:3, 37:16, 49:14, 49:15, 72:12, 82:17, 83:25, 90:15, 115:14
- TUSLA** [1] - 2:27
- Tusla's** [1] - 73:7
- tutored** [1] - 71:16
- two** [15] - 19:16, 24:24, 27:27, 30:7, 39:7, 44:10, 62:29, 66:6, 68:1, 70:18, 75:11, 79:6, 79:11, 84:21, 88:10
- twofold** [1] - 74:1
- type** [6] - 26:29, 32:18, 33:15, 38:24, 102:19, 102:24
- typed** [7] - 27:1, 28:7, 32:19, 32:28, 36:9, 36:14, 38:26
- typically** [1] - 71:27
- typo** [1] - 69:2

## U

- unable** [1] - 88:15
- unallocated** [4] - 50:7, 50:23, 51:8, 59:9
- unauthorised** [1] - 15:15
- unavailable** [1] - 35:21
- unaware** [1] - 46:22
- undated** [1] - 56:25
- UNDER** [2] - 1:3, 1:9
- under** [8] - 66:19,

72:20, 79:12, 84:7,  
91:6, 91:25, 104:10,  
113:1  
**underlying** [1] - 20:22  
**underneath** [1] - 94:1  
**underpin** [1] - 92:24  
**understood** [6] - 10:6,  
11:5, 13:2, 16:28,  
22:2, 22:19  
**undertake** [1] - 98:20  
**undertaken** [3] - 14:7,  
20:20, 97:6  
**unfolding** [1] - 37:11  
**unfounded** [4] - 90:8,  
90:22, 90:28, 99:22  
**unidentified** [2] - 74:8,  
74:12  
**unit** [2] - 49:3, 83:16  
**University** [1] - 48:24  
**unless** [6] - 41:25,  
81:29, 96:10, 98:6,  
98:7, 105:15  
**unlikely** [1] - 73:20  
**unrecorded** [1] -  
41:22  
**unsuccessful** [1] -  
18:4  
**unsure** [1] - 59:26  
**unusual** [2] - 18:16,  
20:25  
**up** [49] - 8:6, 13:7,  
14:11, 18:5, 18:9,  
18:13, 18:15, 18:21,  
18:22, 18:26, 19:12,  
19:14, 19:29, 20:6,  
24:28, 28:3, 32:18,  
32:19, 32:28, 33:9,  
36:10, 36:13, 37:16,  
37:26, 39:16, 42:5,  
42:11, 42:24, 49:2,  
56:16, 62:7, 62:11,  
62:12, 62:17, 65:20,  
76:9, 79:20, 80:1,  
84:6, 93:22, 93:28,  
100:6, 102:14,  
102:27, 103:5,  
108:11, 109:22,  
110:7  
**up-to-date** [3] - 19:29,  
102:14, 103:5  
**update** [2] - 42:12,  
42:27  
**UPPER** [1] - 3:2  
**urgent** [3] - 33:9,  
50:24, 80:10  
**useful** [1] - 113:16  
**usefully** [1] - 89:6

## V

**variety** [1] - 6:27  
**various** [6] - 21:6,  
61:26, 74:7, 89:13,  
106:17, 106:24  
**verbal** [3] - 51:12,  
70:1, 112:17  
**verbally** [1] - 67:3  
**verbatim** [1] - 1:26  
**version** [3] - 36:14,  
67:1, 67:5  
**versus** [1] - 75:7  
**vi** [1] - 87:27  
**via** [3] - 28:16, 46:16,  
70:2  
**victim** [2] - 56:12,  
100:10  
**view** [10] - 11:9, 17:23,  
21:8, 23:23, 28:19,  
28:21, 44:17, 52:25,  
69:12, 82:15  
**views** [1] - 29:2  
**Volume** [3] - 24:11,  
45:25, 48:16  
**volume** [2] - 64:10,  
70:18  
**voluntarily** [1] - 15:2  
**vulnerable** [1] - 82:1

## W

**waiting** [2] - 50:17,  
50:19  
**WALLACE** [1] - 2:25  
**Walsh** [1] - 28:13  
**Ward** [21] - 7:14, 8:7,  
9:26, 13:7, 13:14,  
14:12, 16:1, 16:17,  
16:18, 16:26, 16:28,  
17:9, 17:12, 17:20,  
19:6, 19:10, 20:16,  
22:17, 46:15, 47:25,  
66:2  
**ward** [10] - 7:27, 8:18,  
9:27, 10:6, 12:9,  
12:29, 13:1, 15:10,  
66:20, 69:24  
**ward's** [1] - 69:19  
**Ward's** [4] - 8:23,  
14:16, 16:3, 20:18  
**WAS** [18] - 6:10,  
15:22, 21:1, 24:8,  
31:4, 39:9, 41:29,  
43:9, 45:3, 45:27,  
48:19, 60:7, 64:5,  
70:14, 105:22,  
110:11, 115:12,

116:7  
**WEDNESDAY** [2] -  
1:18, 6:1  
**weekly** [1] - 18:25  
**weeks** [2] - 54:1,  
54:11  
**welcome** [1] - 8:13  
**welfare** [18] - 71:15,  
72:4, 73:9, 73:16,  
78:26, 79:3, 79:14,  
79:18, 81:19, 81:25,  
82:9, 88:19, 91:7,  
91:9, 91:21, 92:6,  
93:21, 97:22  
**Wellbeing** [2] - 49:8,  
49:29  
**wellbeing** [3] - 50:8,  
50:15, 50:22  
**whatsoever** [1] - 10:3  
**whereby** [1] - 80:9  
**whole** [2] - 53:22,  
92:25  
**wholly** [1] - 57:17  
**wife** [2] - 56:8, 101:13  
**willfully** [2] - 83:8,  
94:10  
**WILLIAMS** [1] - 4:1  
**wish** [4] - 75:26,  
79:12, 89:18, 96:10  
**WITHDREW** [6] - 24:3,  
45:22, 48:13, 62:27,  
70:9, 115:23  
**WITNESS** [7] - 5:2,  
24:3, 45:22, 48:13,  
62:27, 70:9, 115:23  
**witness** [9] - 6:7, 6:8,  
24:5, 41:9, 45:24,  
48:15, 64:3, 70:11,  
89:29  
**witnesses** [3] - 63:1,  
115:26, 115:27  
**woman** [1] - 56:15  
**wonder** [1] - 95:8  
**wondering** [2] - 57:5,  
58:6  
**word** [4] - 16:3, 33:24,  
36:10, 44:15  
**worker** [20] - 11:28,  
13:11, 51:7, 71:15,  
85:16, 87:6, 87:11,  
87:17, 88:1, 89:1,  
94:19, 95:3, 96:14,  
96:25, 98:19, 98:21,  
99:3, 99:16, 111:5,  
111:7  
**worker's** [1] - 97:10  
**workers** [7] - 17:24,  
18:11, 22:4, 75:13,  
96:3, 104:26, 110:7  
**workings** [3] - 25:8,

30:2, 96:13  
**write** [8] - 12:13,  
13:29, 19:18, 26:25,  
26:29, 28:21, 57:23,  
102:9  
**writing** [4] - 51:13,  
57:25, 57:29, 98:22  
**written** [11] - 11:15,  
14:15, 22:11, 28:20,  
51:10, 54:12, 54:16,  
56:5, 58:4, 59:4,  
102:24  
**wrote** [6] - 13:14,  
46:15, 61:29, 64:8,  
95:22, 100:7

## Y

**year** [4] - 25:20, 48:29,  
56:13, 80:20  
**years** [2] - 56:16,  
104:10  
**years'** [2] - 36:12,  
36:13  
**yesterday** [7] - 26:8,  
27:4, 29:11, 36:22,  
36:24, 42:6, 100:9  
**yesterday's** [1] - 29:8  
**young** [1] - 50:9  
**yourself** [7] - 15:15,  
26:2, 43:21, 57:23,  
58:1, 59:13, 84:15  
**YVONNE** [1] - 3:13

## -

- [1] - 87:18

## É

**ÉIREANN** [2] - 1:5, 1:6

## Ó

**Ó** [1] - 4:6