

Short Response of Michael E. Lamb Ph.D. to Questions Posed by the  
Right Honourable Sir Thomas Thorpe

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Question One. Do I agree with Dr Parsonson's views and conclusions that child interviewing techniques have become better understood since 1991/1992?

Response: This is certainly true.

Question Two. Do I agree with Dr Parsonson's views and conclusions that the interview techniques adopted in Christchurch in 1991/1992 do not accord with current standards?

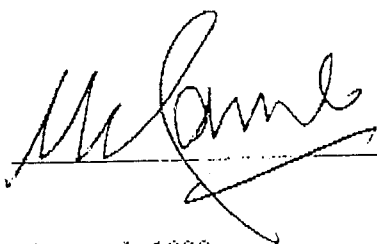
Response: Whilst the interviews in the Ellis case were not the worst interviews I have seen there is much that is known now about the interviewing of children that show up the deficiencies of the Ellis tapes (refer to Part I of my Report). The interviewers in the Ellis case did not do a good job as defined by their performance or relative to current recommendations and best practice guidelines. I accept that there are probably like interviews being conducted today but these occur where interviewers fail to follow the recommendations.

Question Three. Do I agree with Dr Parsonson's views and conclusions that the risks of contamination of the children's evidence were underestimated.

Response. I do not know how the risks of contamination were considered or indeed if they were even considered at all but I see serious risks of contamination in this case. Suggestibility is a concern because the children appear to have been exposed to extensive suggestive questioning in informal contexts, such as in the course of conversations with their parents. All the available evidence suggests that the circumstances were such as to maximize the potential for contamination.

Question Four. Do I agree with Dr Parsonson's views and conclusions that the circumstances of the case (multiple allegations in relation to children attending the same pre-school facility) increased the risk of contamination and called for special action by the interviewers.

Response. Cases involving multiple very young complainants within the same child care centre are more prone to contamination for a variety of reasons. As a result, it is especially important that special steps be taken to minimize the risks. It appears that such steps were not taken in the Ellis case. Indeed the record reveals substantial evidence of actions likely to foster contamination.

A handwritten signature in cursive script, appearing to read "M. Lane", is written over a horizontal line. The signature is fluid and somewhat stylized.

18 March 1999