

**SUBMISSIONS FOR MINISTERIAL INQUIRY INTO
THE CONVICTIONS OF PETER ELLIS**

(ON BEHALF OF THE PARENTS)

PART I : INTRODUCTION

1. These submissions are filed on behalf of some of the parents (Refer: Schedule attached as Appendix A). No instructions have been received by the remaining two sets of parents (parents of X and Z). The parents of complainants of X and Z have, for personal reasons chosen not to be involved in this formal representation.
2. These submissions are limited to Paragraph 1 of the Terms of Reference. The Terms of Reference place an emphasis on the current state of understanding regarding mass allegation child sexual abuse cases. This Inquiry is required to identify the internationally accepted best practice for investigating mass allegations and for interviewing children within that context. The Crown submissions deal extensively with the issue of accepted “best practices” and the significance of the Reports referred to in the schedule to the Terms of Reference.
3. The Crown’s submissions deal with many of the issues the parents consider are important. Accordingly, it is not intended to address matters already dealt with by the Crown.
4. These submissions seek to address general issues relating to best practices as they relate to the families. The submissions will focus on the question of contamination and on what might be expected of parents dealing with situations such as this. As far as possible the submissions will focus only on issues that relate to the Terms of Reference.

5. At the outset it is important to record that the parents are very concerned about the maintenance of their confidentiality and the confidentiality of the children. Suppression orders are still in place and accordingly, it is proposed to refer to the complainants and their parents by using the codes allocated to the children by Justice Williamson in a Memorandum for Counsel at page 658 of the Case on Appeal (relevant references appear as Appendix A). It is of critical importance to the parents that Appendix A to this submission remains confidential to the inquiry and that there is no publication of the names of the parents or their children or of information that could lead to their identification.
6. Throughout the history of this matter, the complainants and their parents have been concerned at the extent of media pressure that has surrounded every stage of this case. Each time these matters are revisited there is further media interest and despite attempts to ensure family privacy, the media interest has become intrusive. The persistent media pressure has had a very detrimental effect on the complainants and their families and has interfered with their recovery. The families have now lived with this matter for almost 10 years, the complainants are now in their early teens and the parents make a strong plea for their privacy to be respected and for this matter to be finally drawn to a conclusion.
7. Because all submissions are being provided to the inquiry Counsel simultaneously, leave is sought to file submissions in reply in the event that matters are raised by other parties that require a response from the parents. Any response would be limited to essential issues only.