Witness Name: J A Kirkham
Statement No: WITN1331001
Exhibits: WITN1331002
Dated: July 2020

INFECTED BLOOD INQUIRY

FIRST WRITTEN STATEMENT OF JULIE ANN KIRKHAM

I, Julie Ann Kirkham, will say as follows:

Section 1. Introduction

1. My name is Julie Ann Kirkham and I was born on GRO-C 1976. I live at GRO-C GRO-C Manchester GRO-C.

2. I make this statement as the affected daughter of my late father, Edward Bradshaw, who was born on GRO-C 1940 and passed away, aged 79 on 25th April 2020.

3. He was infected with Hepatitis C, immunised for Hepatitis B and was told that he had been given blood products that had come from a donor who had since died of vCJD and was therefore exposed and at risk.

4. **This witness statement has been prepared without the benefit of access to my late father's medical records.** My father only passed away very recently and I never applied for his medical records while he was alive because it felt too intrusive, particularly given what a private man he was.

Section 2. How Affected

5. **Exhibit WITN1331002** is a poster which was complied by my father and Professor Hay. My father was the NHS poster boy celebrating 50 years of the NHS and the words on the poster are those of my father and the information was compiled from both interviews with my father and from his medical records.

6. My father had severe Haemophilia for which there was no known treatment during the 1940s. It was therefore very difficult to control his bleeds which meant that he ended up spending most of his early years in hospital and, as a young boy, nearly lost his life on many occasions.

7. At the age of 13 months my father developed sudden bruising on the side of his face. He was admitted to Stepping Hill Hospital (SHH) in Stockport and kept in hospital for one year (during which time he was diagnosed with Haemophilia after a press release had reached an eminent doctor in London) and after going home developed bleeding from his tongue and was once again readmitted. Each time he had a large bleed he would often have to stay in hospital for weeks or even months. There were no children's wards so he was often in a ward full of servicemen. When the diagnosis was made, my grandfather asked whether or not my father's haemophilia would cost anything extra (pre NHS) and my grandfather was told that it would not cost extra while my father was a child but that he might expect to lose threepence from his pension.

8. Over the next few years my father suffered repeated episodes of bleeding (which ties in with the paragraph 9 below) which sometimes included nose bleeds and sometimes bruising, although often it was bleeding in one of his large joints.

9. My father told me that he used to be in his hospital bed on the ward, separated only by a makeshift screen from a row of fresh blood donors, who were donating blood for my father. My father was given the donated blood almost immediately post the donation. My father ended up with the most obscure blood type which I believe was caused as a result of receiving so many different types of blood from a multitude of donors.

10. My father was initially treated at SHH and then at the Manchester Royal Infirmary (MRI) initially under Dr Wensley and then under Professor Hay.

11. In or around 1948, a Haemophilia Clinic was first started at the MRI and my father was seen here as a child. Over the next few years, he was still often admitted to SHH but gradually his care was transferred to the MRI. If he had a large bleed he was treated with a transfusion of fresh whole blood and it was always specified that the blood had to be less than 3 days old. This was because it was recognised that the clotting factors in blood do not last very long after the blood had been collected (this ties in with the donors on the other side of the screen).

12. My grandparents told me about a strange incident that occurred when my father was aged about 7 or 8, which was in or around 1947/1948. My grandfather went to the MRI to visit my father (who was often an inpatient there) and found him in a terrible state; he looked awful and his skin had turned an orangey yellow and resembled orange peel. My grandfather broke down in tears and said to my father "*what have they done to you*". My father was able to tell him that he had been given a big metal syringe full of "*treatment*". My grandfather knew that that no treatment existed so he was both worried and puzzled.

13. When my father was aged around 10 he was admitted to the MRI due to extreme blood loss which the clinicians were unable to control. He was not expected to live through the night; the family gathered around his bed and a chaplain was called to pray for him. A doctor came into the room and said to my grandparents "*we have this treatment in the lab which we have not yet*

tested but we want to test it on Teddy (my father) as he is going to die anyway so it is worth a last shot". My grandparents agreed and my father was given this "*treatment"* which was in a syringe and within moments of him being injected, a huge blood clot came out of his mouth which caused him to start choking. However, unbelievably my father survived the night which astounded the clinicians. The following day my grandfather asked the doctor "*what was in the syringe that you gave my son?"* The doctor replied "*I don't know what you are talking about*" and the incident and "*treatment"* were never referred to again. This story was also told to Professor Hay by my father when they were compiling notes for the NHS poster and Professor Hay told my father that he could not find any evidence of this in the medical notes.

14. My father attracted nationwide interest as a baby due to the severity of his bleeding. A specialist medical professional from London, who had treated the Royal Family, had read about my father's condition in the newspaper and travelled to SH to see my father. As previously stated, it was this professional who diagnosed my father with Haemophilia at 18 months old. It was not unusual for those "*high up*" in the medical profession to travel from "*far and wide"* in order to visit my father. My father was diagnosed with Haemophilia. Haemophilia B was not discovered until the 1950s.

15. A note in the case notes for 28th March 1951 showed that he was admitted to hospital for dental treatment. In order to do this it was necessary to transfuse him with fresh blood, before he had a cyst over his gum removed and a splint fitted over the area where the treatment had been done. On this occasion my father was in hospital for one month. Haemophiliacs could die from dental extraction.

16. Shortly after this, my father was again admitted to hospital for 18 days with a nose bleed and a bleed into his left knee.

17. In 1953 when my father was aged 12, x-rays of his hips showed flattening and distortion of the head of the right femur, which was the result of a dislocated hip which happened when my father was aged 7-8. He also had a loss of movement in both knees due to repeated bleeds into the joints.

18. As my father got older, he also started to have stomach bleeds and occasionally had bleeds in his urine. Over the years he continued to have recurrent bleeds in both his stomach and joints and he also required dental treatment from time to time. Each time this was likely to need hospital treatment and often splints had to be made. Due to the early damage to his right hip joint it was felt, even as early as the 1970s, likely that he would need a hip replacement. My father walked with a very significant limp and wore a heavily built up shoe to compensate for the lack of length in his leg. This was, however, delayed until 1988 when he had a total hip replacement. I remember this well as when he had recovered he was able to wear a pair of trainers for the first time ever and he was so excited that he could even run a little too. It was more of a speed walk but he was elated nonetheless. That hip joint lasted 10 years but he began wearing a built up shoe again sometime before his second hip replacement. This operation was not successful and left my father with a bony growth that spiralled his femur and hip, leaving him with little movement and an even bigger built up shoe. I refer to **Exhibit WITN1331002** for further information in this regard.

19. My father loved and worshipped the NHS because his life had been saved by them on numerous occasions when he was growing up. He never thought that they intended to hurt him but he did say that some of the things they did were "*a bit off the scale*" but had been done with his best interests at heart.

20. My father was very good at managing his condition, so much so that he could often inform the clinicians exactly what was wrong with him and the best way to manage whatever was wrong.

21. My father told me that he had absolutely no trust in Dr GRO-D y. My father felt that he often insulted his intelligence and he was not afraid of letting Dr GRO-D know that this was the case.

22. In the 1970s my father was given blood plasma and cryoprecipitate. I recall sitting in the hospital with my father whilst he was on a plasma drip. I believe

that my father was moved onto Factor IX concentrates when these became available. My father had always insisted on being given "*British*" blood.

23. However, I attended the clinic with him on one occasion (not for a routine appointment), when he had walked in to collect new treatment supplies. He was met by a very surly Olive Redding, who was at the time the Haemophilia Co-ordinator. It was quite clear my father was just turning up as he had always done but he was not welcomed and was asked in a passive aggressive manner "*What do you think you're doing here?*" My father replied, probably a little sarcastically, "*Oh I am sorry Olive, I didn't realise I now needed an appointment*". The clinic had long since been an open walk in for my father but this was around the time when "*the shutters were coming down*". There was clearly a friction which surprised me as my father was such a laid back, likable character who would have always previously been greeted like "*part of the furniture*". Indeed, as a child I remember feeling quite perturbed at this change, as previously immediately upon arrival I would have been whisked into the office and fussed over, with biscuits and juice by the office staff but now I was told to wait in the waiting room. There was a definite air of not being welcomed and my parents felt like there was something to hide.

24. When my father went into the treatment room for his treatment, Olive passed him a box off the shelf. My father looked puzzled and kept turning it over and over in his and hands whilst slowly trying to read the writing on the box. As my father was near illiterate he passed it to me, as he often did when he needed something reading out, and said "*what does it say there Julie-Ann?*" I replied "*USA*". My father replied "*that's what I thought*". I remember that the box was blue and white and the treatment kit was laid out nicely presented in the box and completely different to the treatment he would have collected before in a carrier bag. My father said "*this is not my usual treatment, I want British product*". Olive replied that he could "*like it or lump it as that was all he was getting*". My father refused the treatment and Olive told him that he wouldn't be getting any treatment then, to which my father replied "*I have gone 30 years without, I can go another 30 years*". My father strongly felt that

they were trying to "*win him over with the fancy packaging and kit*" and I know that he always strongly felt that refusing treatment on this day meant he dodged the HIV bullet.

25. My father told me that there had always an "*open door*" policy at the MRI and that if he ever needed treatment or anything else he would just wander in and everyone would make him feel welcome. However, my father said that all of this changed in the 1980s and the "*open door*" policy was replaced by an atmosphere of mistrust, arguments and a "*firmly closed door*" policy.

26. Neither my grandparents nor my father were ever given any advice or warning in relation to the risk of infection from blood or blood products.

27. I have a reasonably good memory of how and when my father found out that he was infected with Hepatitis C. He was summoned to the MRI in the late 1990s and attended with my late mother. They arrived home absolutely livid. A consultant had told my father that he had been infected with Hepatitis C but they did not know how or when the infection had occurred. They also told him that they had known that it had been in his blood for a long time but they had not told my father this because they did not have a name for it. My father was given insufficient information to allow him to understand or manage the virus. He was asked if he was a drinker which desperately angered and upset my father as he was not. My father probably had half a pint of bitter once a year.

28. My late mother was told that she would have to undergo a test and thankfully the result was negative. My late mother was a feisty character, the very opposite of my father, and she said to the consultant "*if it comes back that I have caught this thing, this hospital will not hold me*". She would have given them hell.

29. About two weeks after this appointment, I also got summoned to the MRI. I was heavily pregnant with my third child and I duly attended with my ex-husband. We sat in a consultation room, together with Professor Hay and two nurses called Paula and Elaine. They were all shuffling papers and looking

rather sheepish. Professor Hay then said to me *"I am really sorry to tell you that you have Hepatitis C".* The whole room started spinning and all I could think about were my children. I felt that the floor was falling away beneath me. I am not sure exactly what was said after this but the next thing I heard was Professor Hay saying "*sadly, everyone who had treatment up to 1987 has probably caught Hepatitis C*". I said "*but I did not have treatment until 1988" (I also have Haemophilia B which required treatment with Factor IX concentrates)".* Professor Hay then started shuffling his papers and said "*oh, you will be ok, you won't have it*". I said "*do you mean to tell me that you have told me that I have Hepatitis C without even testing me, and now you are telling me that I will be ok?".* He then ordered that I undergo a test which I did and the result came back negative.

30. I forcefully declined to know whether I had been put at risk of vCJD or any other pathogens.

31. I also recall attending a routine consultation with my father at the MRI with Professor Hay when we were both very quickly given immunisations for Hepatitis B. We were not given any advice or told anything further in relation to Hepatitis B. I recently attended an orthopaedic appointment and the consultant flagged that I had had Hepatitis B and would require a test in this regard.

32. I also wanted to mention a meeting that my late mother and father attended at the MRI in the 1980s which was also attended by Norma Guy from the Haemophilia Society (HS). I believe that the meeting had possibly been instigated by the HS because they wanted to understand why Haemophiliacs were becoming infected with HIV. My father told me that the clinicians informed everyone at the meeting that HIV had come from "*green monkeys in Africa".* I remember my late mother and father returning from this meeting, absolutely livid in relation to what the clinicians had told people. I had been left with the neighbours so that my parents could attend this meeting and I was sent straight to bed upon their return.

Section 3. Other Infections

33. My father was exposed to and put at risk of vCJD.

Section 4. Consent

34. My father and I believe that he was tested for various viruses without his knowledge and therefore without his consent. The clinicians used to take blood extremely regularly and it seemed like they took it "*for the sake of it*". My father used to jokingly say to them "*you are vampires; you only took my blood the other day*". The response given was always the same which was "*oh we have just got to check your levels*".

35. My father and I also believe that he was used for the purposes of research without his knowledge and consent and I refer to the foregoing.

Section 5. Impact

36. Looking back to my childhood, I remember things being very strained and difficult in the home during the 1980s. As a child I could almost taste the fear which was present in my house. I didn't know what HIV or AIDS was, I didn't understand it, but I felt like whatever it was it was coming for us and for my father. I remember my father saying that the people he would sit and chat to at clinic appointments, men he had often spent time as inpatients with, since being a child, were "dropping like flies". The waiting room grew emptier and emptier and gloomier.

37. It was not until I became an adult that my parents told me that this fear had been caused by the huge worry and stigma which enshrouded HIV and the fact that it was wrongly assumed that all haemophiliacs had AIDS. This was despite the fact that my father had managed to dodge the HIV bullet.

38. One thing in particular disturbed me as a small child and that was the abrupt change in my bedtime routine. I used to always get into my pyjamas, brush

my teeth and come downstairs and give my late mother and father a kiss and then I would sit on the arm of my father's chair. One day my late mother pulled me to one side and said "*you need to stop giving your dad a goodnight kiss because you are too old for that now".* I thought that I had done something wrong and this horrible feeling remained with me throughout my life. The next night I therefore ran upstairs, straight past my father, to bed without giving him a kiss or sitting on the arm of his chair. I found out later that he had asked my late mother whether something was wrong with me to which she had replied "*it is just her hormones, leave her alone".* My father was really upset by this as he had no idea that my mother had pulled me aside and said what she had to me. When I found out that my actions (carried out under my late mother's instructions) had upset my father, I was really sad. The kissing and affection from my late mother also quickly petered out without any explanation being given at the time.

39. I remember questioning my late mother about this incident when I was an adult and she said "*look Julie, we did not know what was happening and we did not want you to catch anything from us".* However, when my first child was born I was unable to say "*I love you*" to my first born daughter and my partner calls me "*a cold fish".* I have been affected by what happened to me as a child and I have been unable to shake off the feeling that I did something wrong as a child. However, I am a grandma now and I do understand that what my late mother did was done out of love and not for any other reason.

40. During this difficult time in my childhood, it felt like my parents had transformed from being the most loving and laid back people into very stressed and argumentative individuals who frequently shouted. I was told not to utter a word to the outside world about my father's Haemophilia. This was of course due to the fact that everyone (wrongly) assumed that all haemophiliacs had AIDS. I also remember being bullied at school during this time and would regularly hear "*don't play with her you might catch something".* Even the drama teacher once said to me, when I cut my hand, "*oh get away from me I might catch AIDS from you".* The head teacher asked my parents "*whether things were okay at home?*" because I had become very withdrawn

and quiet during this time. I remember feeling victimised and that something was coming for me; but I did not really know what was coming or what to look out for.

41. However, I have never been brought up in a "*woe is me family*", everything that happened, happened for a reason and I believe that "*what doesn't kill you makes you stronger*". My family don't really do anger and my father's motto was "*there is always someone worse off than you*". We just got on with things and going forward, I have tried not to dwell too much on the past.

42. I have memories of being banished from the kitchen when my father was having his treatment at home. There seemed to be an atmosphere of fear and stress. This was further accentuated if my father cut himself which resulted in my mother shouting orders at me to "*stay out of the way*". Again, it was only later on in life that my mother told me that they were petrified that I would catch something which is why they behaved as they did and why an atmosphere of fear existed.

43. My father and I were "*as thick as thieves*". I used to accompany him to nearly all of his Haemophilia appointments and he would always attend my antenatal appointments with me. We were each other's shadows.

44. Growing up I desperately wanted to be a nurse and in the 1980s I overheard something on the news about a nurse who had caught HIV via needle stick injury and I knew that HIV was a really bad thing. This put me off becoming a nurse; I really wanted to ask my late mother and father about this but I knew that I couldn't as I had been banned from listening to the news. Then in 1986/1987 my father's mother had a stroke which resulted in her coming to live with my family and I cared for her. When she attended a care home for a period of respite care she proudly told everyone in the home that I wanted to be a nurse. When she found out that I had changed my mind about this career she was really upset because she thought that my caring for her had put me off becoming a nurse. It was the HIV that had put me off but, of course, I could not say that. She died not long after that. My grandad died

before her; he had a heart attack in 1984 and died on my father's birthday. I strongly believe that both my father's parents died, before their time, due to the stress of what happened to my father.

45. My father was respectful, kind and stoic. I remember him telling me that when he was a small child he was given a white coat and stethoscope by the clinicians and they used to let him accompany them on their ward rounds. My father spent so much time in hospital which meant that he was always in the company of academics and professionals. Despite the fact that he grew up with no formal education, he was in fact extremely well educated and eloquent. He was also incredibly popular with everyone including the nurses and I still have a book which my father dearly treasured as it was given to him by Betty, who was his favourite nurse, in the 1940s.

46. My father underwent a course of Interferon and Ribavirin in 2004 and following this, his health declined steeply. I strongly believe that I lost my father to this treatment and my mother has no doubt in her mind that she lost her husband to this treatment. It was even more upsetting because my father was relatively as fit and as healthy as he could be prior to embarking upon the treatment; the virus was laying dormant but none the less he wanted rid of it.

47. As soon as my father started the treatment, he became immediately, massively unwell; it floored him. He suffered excruciating headaches and was struck down with what seemed like a deep depression. Literally overnight, my father had gone from being a relatively happy, chilled family man to someone who didn't want to get out of bed, see anyone and had zero tolerance for any noise whatsoever.

48. After the treatment had finished, my father complained of a number of problems to include headaches, brain fog, general malaise, problems with his hands and fingers, bowel and bladder problems and breathlessness.

49. I noticed subtle changes in his behaviour too; it was difficult to put your finger on exactly what was wrong, but his behaviour was not the same as it had been prior to the treatment.

50. My father then underwent a brain scan in or around 2006 which showed frontal lobe shrinkage and as a result of this, clinicians immediately diagnosed him with early onset Alzheimer's. This diagnosis left my poor father feeling suicidal.

51. However, I was fairly certain that he didn't have Alzheimer's and approximately eighteen months after this diagnosis, I formally complained to the Manchester University NHS Foundation Trust that the MRI had basically dropped a "*bombshell*" diagnosis on my father with no associated evidence or research such as behavioural, cognitive testing or memory testing. My father had been left to deal with such a diagnosis alone with no associated follow up or support.

52. Clinicians at the MRI then carried out a series of tests which, as I had expected, ruled out Alzheimer's. They told me that he was "*an enigma*" and that they had no idea what was wrong with him. Up until this point, my father was still driving his car but he eventually had to give this up as he recognised that he was not the same person that he once was, despite the fact that the clinicians were unable to diagnose him.

53. Time passed and my father's health declined further to the point where he was now immobile. Clinicians then came up with the diagnosis of Lewy Body Dementia which was prompted by the fact that the clinicians thought that my father was hallucinating seeing children and birds. In fact, what my father was doing was looking at reflections from his bed in his marble fireplace. This second diagnosis was then swept away and my father continued to live in an almost locked in, slowly deteriorating state and surpassing life expectancies for both diagnoses.

54. Clinicians then referred to my father's condition as a "*neurological deficit*" but acknowledged that my father had awareness of what was being said and what was happening around him.

55. At this time, we as a family knew that my father was aware of what we were saying and who we all were. He used to laugh at jokes and make correct and appropriate facial expressions when being spoken to. He was also able to communicate in "*yes and no*" language.

56. My late mother was my father's main carer until she passed away in November 2017. My father's illness really took its toll on her and she had been caring for him since the 1970s. My father's awareness was proved when we had to tell him that his wife had died. He managed two words, with expression, saying disbelievingly "*she hasn't*"? I said "*she has Dad*" and he sobbed uncontrollably for hours and cried for days. His health deteriorated again after my late mother's passing. He used to look towards where her chair had been and cry.

57. In November 2017 I quit my full time job to move in with my father in order to ensure that his care could be continued. He also had paid carers, from Nightingales Homecare, who would come in and look after his personal and who fed him, however, I would do everything else. I continued to help him with all of his correspondences. My father was extremely dignified and conservative and his wishes were that his children would never change or wash him.

58. In February/March 2018 I witnessed some disgraceful behaviour from my father's carers. They used to tell me that my father had not been hungry yet they only ever offered him frozen food which was impossible for him to eat. They had not even bothered to cook it properly. I also used to have a baby monitor which was upstairs so I could always hear my father because I slept upstairs and he downstairs. One day I overheard, on the baby monitor, one of the carers speaking to my father. She said *"I bet you don't like being stuck here with these people"*. I had never heard my father swear in all my life yet

on this day I heard him, again via the baby monitor, mutter "*you bitch*" to the carer. I knew that he was not being cared for properly and I therefore took the decision to move my father to a care home. This was the best decision I could ever have made as my father's health seemed to pick up and he looked better than he had done in ages. He smelt lovely and clean because he was having regular baths and showers.

59. I attended my father's last appointment at the MRI with Professor Hay and I recall that one of his carers also attended. I remember putting to Professor Hay the fact that mine and the family's view was that the treatment for Hepatitis C had caused my father's health to decline steeply. Professor Hay felt quite dismissive of the question and said that he would put the question to the neurologist but we never heard anything further.

60. During the last couple of years of my father's life he had been bed bound, had no ability to feed himself, was doubly incontinent and possessed no communication skills. He finally lost his fight for life, aged 79, on 25th April 2020.

Section 6. Treatment/care/support

61. Sometime after 2004, my father developed an ulcer following his diagnosis of Helicobacter Pylori. He therefore had to undergo a colonoscopy and a gastroscopy. Prior to these procedures being undertaken, my father started to pass blood in his stools which scared him. He therefore raised this with one of the consultants, whose name I do not know, only to be told "*you do realise how much this scan is going to cost me because I have to give you your own scope and then dispose of this afterwards due to the risk you pose in relation to vCJD*".

62. Neither my father nor I have ever been offered counselling or psychological support in consequence of his infections.

Section 7. Financial Assistance

63. Money was very tight when I grew up in the 1980s and I remember that the norm consisted of an empty fridge, no gas on and no electric. By this time, my father's health had started to decline and I remember my mother saying to him "*come on what is wrong with you?*" However, unbeknown to both of them, the Hepatitis C was working behind the scene and was causing my father's extremely lethargic state. When my father was too poorly to go to work, he was pensioned off and had to claim benefits. He was devastated. However, my parents always drummed into me the importance of a hard day's work and I knew that my father was only on benefits because he had no choice in the matter. My late mother and father had an interest only mortgage and I remember that they had to rely on my uncle for financial support which enabled them to keep a roof over our heads.

64. Therefore when my father received the Stage 1 Payment of £20,000 (which I believe was in 1997 because I remember my father treating me to a new maternity dress from Dorothy Perkins and I felt like a princess in it!) from the Skipton Fund (SF) they were able to pay off the mortgage and I remember my late mother crying with relief. Our family had lived with the threat of losing our home for so long. My parents' were also able to carry out some long overdue and essential repairs to the house and they also purchased a new boiler.

65. Over the years I have also supported my parents financially which caused problems between my ex-husband and me.

66. Prior to my father's passing, he received financial support from EIBSS which included an annual winter fuel payment.

67. I have never received any financial support; the only time I tried to claim benefits was when I was caring for my father but I found the whole process a complete nightmare and ultimately my application was unsuccessful. After I moved in with my father, following my late mother's death I lived on the savings I had, whilst awaiting a claim for Carer's Allowance to come through. I eventually applied for Universal Credit and stepping foot in a job centre for the

first time in my life was very intimidating as they had security on the door and people were fighting outside, which immediately put me in debt, as I had to take out a loan with them to get through the month until payment day. The Carer's Allowance took months to come through by which time the Universal Credit had allocated just over £200 per month for myself and my then dependent son to live on for a month, so it was this financial suicide and the ever increasing appalling situation with the home carers which led me to make the decision to move my father into a care home. A decision that has now left me riddled with guilt, as my father was so happy and cared for there, but ended up dying in there of Covid-19 alone.

Section 8. Other Issues

68. I want the truth to come out and for those who have committed wrong acts to be brought to account. Those infected, and their families, need answers and closure.

69. I want assurances that something of this magnitude never happens again but sadly I don't have much trust or faith that this will be the case.

70. I have been left with a huge amount of mistrust in the NHS and the UK Government. My father always told me to make sure I educate myself and never allow myself to be "*spoon fed*" anything. I have tried to leave by his motto.

Anonymity

71. I do not want to apply for anonymity.

72. I would like to give oral evidence to the Inquiry because I feel that my father would have spoken out, despite the fact that he was a massively private man. He would have felt that he needed to stand up and be counted.

Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed.. GRO-C ....

Dated.........9.9.2020...