

Summaries of Witness Evidence for Contextual Hearing

29 October – 8 November 2019

Judge Carolyn Henwood

Her Honour Judge Henwood was the Chair of the Confidential Listening and Assistance Service (CLAS) which ran from 2008 to 2015. CLAS provided a confidential panel, facilitating counselling and assistance for people who experienced abuse or neglect during their time in State care in residential special education, health and welfare sectors before 1992.

Judge Henwood will reflect on the major common themes that came through from the over 1100 survivors that she heard from, the legacy of the effects that they suffered, concerns around systemic failures within State care, the processes and policies which contributed to poor outcomes, and the barriers to positive outcomes for survivors. Judge Henwood will discuss the final report of the Service, *Some Memories Never Fade*, and the Government's response at the time, and give recommendations for the Royal Commission's work moving forward.

Arthur Taylor

Mr Taylor has spent 40 of his 63 years in prison. He will give evidence about being violently removed from his family by child welfare officers and taken into State care at only 11 years for being "NUPC" – not under proper control – because he had been wagging school. He will describe his three stints in Epuni Boys' Home and the abuse he endured and witnessed there, his incarceration in a psychiatric facility as a teenager, and the road he took from State care to prison. Mr Taylor considers just as Australia had its "Stolen Generation", so did New Zealand. Thousands of children, the vast majority Māori and Pasifika, were taken from their families, placed with strangers, and had their lives irrevocably blighted. Many ended up in the criminal justice system, and in jail. He considers this was not only to the detriment of the children and their whānau, but to the community who suffered from crime and the enormous expenditure of public funds that would not have happened but for the abuse perpetrated against these children. Mr Taylor will address the lessons to be learned from this so that the mistakes of the past are never repeated, and the need for recognition and acknowledgment of the harm that was caused and the opportunities that were lost.

Dr Rawiri Waretini-Karena

Ngāti Māhanga, Ngāti Māhuta, Ngāti Hine, Ngāti Kāhu, Te Rarawa

Dr Rawiri Waretini-Karena is a lecturer and Postdoctoral Research Fellow at Te Whare Wānanga o Awanuiarangi. His life has caused him to reflect on the experiences and impacts of intergenerational trauma stemming from colonisation, and especially arising in early legislation and policy in Aotearoa New Zealand. He reflects on the intergenerational trauma within his own whakapapa, and how colonialism, the State, and State care have contributed to that narrative. His areas of research have focussed on this and the impact on Māori in order to contextualise the deficits that the many Māori who share aspects of this narrative face within Aotearoa New Zealand.

Dr Alison Green

Ngati Awa (Ngati Pukeko), Ngati Ranginui (Ngaitamarawaho) Ngaiterangi (Ngaitukairangi)

Dr Alison Green is a researcher at Te Kotahi Research Institute, University of Waikato. She holds a PhD in Māori and Indigenous Development from the University of Waikato. Dr Green is the recipient of the inaugural international Indigenous Misiweskamin Postdoctoral Fellowship to the University of Saskatchewan. Her postdoctoral research compares legislation and policy for the removal of indigenous children from families in Aotearoa New Zealand and Canada. She draws on her own life experience of closed adoption in 1958, and the racist attitudes that underpinned such practice at that time. She reflects on her whakapapa as a means of illustrating the intergenerational impacts of colonialism, legislative settings, on her own whānau (through to current involvement with the State care system) in the context of different pathways through State care, which have led to varying impacts and outcomes, many of which are negative within members of her whānau.

Fa'afete Taito

Mr Taito will give evidence about his experience as a Samoan New Zealander being removed from his family as a child following intervention by the State. He was made a state ward and sent to Owairaka Boys' Home in the 1970s and his account of abuse and neglect in care set him up on a pathway to becoming a fully patched gang member at the age of 17. Mr Taito spent many years in the gang and criminal lifestyle before leaving that behind to embark on study in 2009. He now holds a Bachelor of Arts from the University of Auckland with a double major in Sociology and Māori. Mr Taito's evidence will explore some of the broader experience of Pacific communities in New Zealand in the 1970s and 1980s, and he will also draw on his own experience to explain the long-lasting impacts of his time in care as a ward of the state.

Aaron Smale

Ngāti Porou, Ngā Puhi, Whakatohea

As a freelance investigative journalist and photographer, and with lived experience of state intervention having been adopted and raised outside of his natural whānau, Mr Smale has covered the stories of children in state custody as a Māori social issue. Since 2016 Mr Smale has collected stories from survivors and published stories in long-form articles, as well as analysis of various aspects. He is currently working on a documentary series on the subject and is a PhD candidate in history, researching the origins and impacts on Māori. Mr Smale will reflect on his work to date and the themes arising from the voices of survivors and expert and primary evidence obtained from his investigations, focussing on the state's behaviour, international comparisons for indigenous children in state custody, and the impact on Māori in particular.

Dr Oliver Sutherland

As one of the members of the Nelson Māori committee and the Auckland Committee on Racism and Discrimination (ACORD), Dr Sutherland spent 15 years campaigning and advocating on behalf of many children who were in State care during the 1970s and 1980s. Based on extensive archival material from ACORD, Dr Sutherland will give evidence about

- The structures (policing, arrest, courts, remand, sentencing) that funnelled young people into State care;
- Structural racism and the differential outcomes for Māori children in the system;
- Accounts of abuse in welfare homes, Lake Alice, and from children remanded to adult prison; and
- Details of the campaigns, key reports and inquiries during this period to stop racist state violence against children.

Sir Kim Workman

Ngāti Kahungunu, Rangitaane

Sir Kim Workman will give evidence about his early experience as a Police youth aid officer in the 1970s, and his subsequent work detailing the racial profiling of Māori and the disproportionate number of Māori in care. This included regular visits to Kohitere in the early 1970s and learning of the abuse, violence, and neglect that took place there.

Sir Kim will also speak to some of the legislative changes throughout the 1970s and 1980s in the area of children and youth justice, and the significant *Puao-te-ata-tu* report for which he was an advisor. Some of the proposed solutions, including the Matua Whangai programme, will be outlined and the barriers to reform to date will be explored.

Dr Brigit Mirfin-Veitch

Dr Brigit Mirfin-Veitch is the Director of the Donald Beasley Institute, an independent charitable trust that conducts research and education in the area of disability with a specific focus on learning (intellectual) disability. Her research has explored deinstitutionalisation from the perspectives of family members of people with a learning (intellectual) disability who were moved from Templeton institution and the Kimberley Centre, the last of New Zealand's large institutions to close.

Dr Mirfin-Veitch's wider research projects in the area of parenting, health and wellbeing and the justice system have included many people with learning disabilities who have reported abuse in State care. She was the co-author of "'Institutions are places of abuse': The experiences of disabled children and adults in State Care", published in 2017.

Dr Mirfin-Veitch will address the nature and extent of abuse and neglect that occurred to people with learning disabilities in State care between the 1950s-1990s, and the impacts on the person abused as well as their family, whānau and community. She will discuss the systemic factors that allowed abuse to occur in institutions and the changes through deinstitutionalisation, and how abuse currently features in the lives of people with learning disabilities.

Dr Hilary Stace

Dr Stace will give a disability perspective on the road to the Royal Commission. A Government inquiry in 1953 recommended that the existing psychopaedic institutions be extended into large 'mental deficiency colonies' with parents encouraged to send their disabled children to them by the age of five. In 1964 it was estimated that one in a thousand children had an impairment requiring such incarceration. By the early 1970s, when another Inquiry proposed the closure of such institutions, hundreds of children and adults who had managed to survive lived in such places. Abuse in many forms thrived in such environments. The last institution, Kimberley, finally closed in 2006.

Why were these young people locked away from families and communities for who they were, rather than anything they had done? Why were children taken off mothers who were told to forget about them? Dr Stace will discuss how these policies can be traced back to the Social Darwinism of the previous century and the false science of eugenics which was promoted by influential politicians, public servants, academics and doctors as a way to create an ideal 'fit' society. 'Deviance', 'defect' and 'delinquency' threatened this vision and those people assumed to be the cause - including those with certain impairments – were segregated in order to prevent their breeding.

Dr Stace's evidence will address the intersection of colonisation, racism and eugenics that helped create a toxic mix of surveillance and oppression which led to the institutionalisation of thousands of children, young people and adults in a network of sites across New Zealand. Māori were disproportionately affected. Remnants of eugenic discrimination remain today in ongoing reports of abuse of disabled people.

Mary O'Hagan

Ms O'Hagan will provide historical context of abuse in the psychiatric system, including as it relates to Te Tiriti o Waitangi, key milestones between 1950 and 1999 and the survivor movement.

She will describe what 'abuse in State care' means within a psychiatric system context and the nature of abuses in State care, as well as addressing systems and factors leading well as to abuse in psychiatric care, and outlining the ways in which the Mental Health (Compulsory Assessment and Treatment) Act plays a role in abuse in care and the consequences for people subjected to the Act.

Ms O'Hagan will demonstrate ways in which the psychiatric system and routine practice constitute abuse, will provide evidence of the experience and impacts of abuses at an individual level, and address the social determinants of distress.

Recommendations will be made for transformation at a social systems level, as well as new ways of conceptualising 'distress' and providing a range of supports generated by, or located within, communities (i.e. the Wellbeing Manifesto vision and the Māori Manifesto vision). Ms O'Hagan will also provide some suggestions for redress and rehabilitation.

Sonja Cooper and Amanda Hill

Evidence from Sonja Cooper and Amanda Hill on behalf of Cooper Legal will address:

- The beginnings of the civil claims against the State for abuse in psychiatric hospitals and Social Welfare care;
- How the claims grew, and how the State responded – with a mixture of ‘listening’ forums and fierce, uncompromising defence in the Court;
- How State mechanisms such as the Courts and Legal Aid played a role in the claims process;
- The role of our human rights law – both national and international – in progressing the civil claims;
- Settlement processes both past and current, and why they are not fit for purpose; and
- The disadvantages experienced by many survivors, including: less access to information; fewer resources to obtain help; often poor literacy or mental health and economic circumstances which pressure them to accept amounts of compensation which do not reflect their experiences; and
- What they see as the way forward for the claims process as part of a larger truth and reconciliation process.

Rosslyn Noonan

Ms Noonan is the Director of the New Zealand Centre for Human Rights Law, Policy and Practice. She also works with national human rights institutions across Asia and the Pacific and advises governments on the establishment and strengthening of national human rights institutions. She was New Zealand’s Chief Human Rights Commissioner from 2001 to 2011. During that time she chaired the global body of national human rights institutions for two years (2010-2012). In 2018 she was appointed as the chairperson of the Independent Panel reviewing the family justice services as they relate to the Care of Children Act 2004.

Ms Noonan has played a considerable role in paving the way to the establishment of the Royal Commission, including while she was Chief Commissioner of the Human Rights Commission. She will reflect on the efforts that were made while she was Chief Commissioner to bring the issue of abuse in care to the attention of the wider New Zealand public and the Government, and since. Ms Noonan will outline why she became convinced that a Royal Commission, an independent inquiry of the highest status, was essential to identify and acknowledge the extent of damage done to many children and vulnerable adults who were taken into State care and the impact of their experiences of care on them, their families and their communities. She will explain the need for a Royal Commission to ensure redress for the survivors and to hold accountable those responsible for failing to ensure protection for children and vulnerable adults in the State’s care and failing to take appropriate action when knowledge of the abuse became known. She will also explain the relevance and importance of the international and New Zealand human rights standards to the issue of abuse in care.

Associate Professor Elizabeth Stanley

Associate Professor Stanley will give evidence about the nature of abuse in State care based on her extensive research for the published book *The Road To Hell: State Violence against Children in Postwar New Zealand*. The book tells the story of 105 New Zealanders who experienced abuse and neglect in care as children.

Associate Professor Stanley will cover:

- An overview of abuse, including the daily degradations children experienced in institutions
- The structural framework that enabled institutional impunity: the ways adults and institutions were able to carry out and cover up abuse for many years
- The care to custody pipelines and the factors which increase the chances of those in care ending up in prison. This will also touch on some of the issues in the current landscape, particularly in terms of risk
- Legacies of abuse in care including long terms impacts for individuals, families and communities.

Robert Martin MNZM

Mr Martin is a disability rights activist. In 2016 he was the first person with a learning disability to be elected onto a United Nations Treaty Body, the Committee for the Rights of Persons with Disabilities. He suffered a brain injury at birth and as a baby was sent to the Kimberley Centre. He had some brief periods of time with his family and in foster homes, otherwise he spent his entire childhood and early teenage years in institutions including, Lake Alice, Kimberley and Campbell Park School, as a ward of the State. Mr Martin will give evidence about all the forms of abuse and neglect he experienced while living in State care, how this has impacted his life, and his hopes for the future.

Dr Maria Haenga-Collins

Ngāti Porou, Te Aitanga-a-Māhaki, Ngāi Tahu

Dr Maria Haenga-Collins has a background in social work, Māori-centered research and history. She completed her master's thesis 'Belonging and Whakapapa: the closed stranger adoption of Māori children into Pākehā families' at Massey University in 2011. Her doctoral thesis 'Closed Stranger Adoption, Māori and Race Relations in Aotearoa New Zealand, 1955-1985, undertaken at the Australian National University, extended on this initial research. She is currently a Primary Investigator on a Marsden funded research project examining the outcomes of policy on Māori in relation to closed adoptions and the practice of whāngai.

Dr Haenga-Collins will give evidence about the State processes impacting on Māori in relation to adoption and whāngai. During the period of closed stranger adoption in New Zealand (1955-1985) the majority of Māori babies were adopted into Pākehā families. The authorities often made the decision that Māori families and grandparents who wanted to adopt related children were too old or too poor, and preference was given to Pākehā strangers to adopt over Māori kin. Dr Haenga-Collins will also give evidence about the on-going intergenerational trauma and socio-cultural marginalisation of Māori removed from their families of origin.

Dr Anne Else MNZM

Dr Else is a writer, researcher and editor, and wrote the first comprehensive history of post-war adoption in New Zealand from 1944-1974. Dr Else will give evidence about the growth of adoption and the State's involvement in closed stranger adoption since the 1955 Adoption Act. She will discuss the practice of "matching for marginality", where the 'best' children were placed with the 'best' couples and hard-to-place children were placed with couples that social workers perceived as marginal.

Dr Else will also discuss how ex-nuptial children could enter State care. In the 1960s, the number of babies available for adoption outnumbered those wanting to adopt. It became more difficult to find homes for babies who were 'different' from the norm in some way, such as being of 'mixed race'. If no adopters could be found or an adoption placement broke down, the baby was not returned to the birth mother but was placed in the care of the State.

Professor Michael Tarren-Sweeney

Professor Michael Tarren-Sweeney is a Professor of Child and Family Psychology at the University of Canterbury. He is a clinical child psychologist, psychiatric epidemiologist and child developmental theorist. His life's work has been to increase our understanding of the psychological development and well-being of children in care, those adopted from care, and other children who have ongoing need for care, with a view to improving lives. Important contributions in this field include: the Children in Care study and the Assessment Checklist for Children which have helped improved understanding of adopted and 'in care' children. He has advised government departments in Ireland, Scotland, England and Australia (Federal as well as NSW and SA State Ministries) on how to improve the lives of children in State care.

Professor Tarren-Sweeney will draw on his expertise in order to provide context to:

- the impact of maltreatment, neglect, trauma on the psychological development of children (before entering, and whilst in) State care
- what is required from a clinical perspective to meet the needs of children with such profiles once in State care, as well as from a growth and wellbeing perspective (including attachment theory)
- Common systemic factors that can compromise the quality of care delivered (including the impact of multiple placements on attachments)

Dr Charlene Rapsey

Dr Charlene Rapsey is a clinical psychologist and lecturer in the Department of Psychological Medicine, University of Otago. Dr Rapsey's research interests include mental disorder, childhood adversity, sexual health and sexual difficulties. She uses quantitative and mixed methods and has a particular interest in applied research. Whilst in practice, Dr Rapsey has worked as an ACC approved clinical psychologist with incarcerated men who were victims of sexual abuse. This work also included working with those where the abuse occurred in state care and she brings an understanding of the issues faced by survivors of abuse in care.

Her current research projects include:

- Psychiatric epidemiology - The WHO World Mental Health Surveys project is a unique international collaboration with over 30 countries focused on epidemiology and the prevention of mental disorder.
- Childhood adversity - The Otago Women's Health Study, a 25-year longitudinal study investigating associations between childhood abuse and outcomes across the life course.
- The Foster the Whanau project - investigates the costs, benefits, and long-term outcomes for children when the mother participates in an intensive, residential intervention as an alternative to foster care.

Dr Rapsey will draw on her areas of expertise to provide local context on:

- The effects, individualised and wider, of all forms of maltreatment of children, and all forms of abuse;
- Effects and risks where maltreatment occurs in State care;
- Foster care outcomes and alternatives to foster care within the New Zealand context.

Professor Tracey McIntosh

Ngāi Tūhoe

Professor Tracey McIntosh is a sociologist and Professor of Indigenous Studies and Co-Director of Wānanga o Waipapa at the University of Auckland. She was previously the Co-Director of Ngā Pae o te Māramatanga (NPM), New Zealand's Māori Centre of Research Excellence hosted by the University of Auckland. She was recently a member of the Welfare Expert Advisory Group and Te Uepū Hāpai i te Ora - The Safe and Effective Justice Advisory Group. She is presently the Co-Chair of the Cannabis Expert Panel. Professor McIntosh's personal research programme focusses on crime and marginalisation, social harm reduction, Māori and incarceration, State institutions and Māori, Māori women and incarceration; gang associated whanau, indigenous peoples and the criminal justice system and family violence prevention.

Professor McIntosh will draw on her areas of research and writing alongside extensive work within the criminal justice community, which includes working with prisoners, whānau of prisoners, gang members, and gang associated whānau in order to contextualise the role of State care, and abuse in care in respect of the lives of the marginalised, relating to: male and female prisoners, Māori hyper-incarceration and gangs, as well as discussing criminal justice impacts in respect of those affected and on society in as a whole in Aotearoa New Zealand.

Beverley Wardle-Jackson

Ms Wardle-Jackson will give evidence about the abuse and neglect she suffered as a child in State care. She will describe being placed under the preventive supervision of the Superintendent at age 7 years, and being sent with her sisters to the Florence Booth Salvation Army Home, where she remained for about a year and suffered severe beatings. Ms Wardle-Jackson will describe being sent to Miramar Girls' Home as a State Ward, and then being moved to Strathmore Girls' Receiving Home

and the Riccarton Family Home in Christchurch, followed by Fareham House in Featherston. In all of these placements she suffered serious physical abuse and was locked in rooms and an attic for long periods as punishment. She was also sexually abused while under the notice of Child Welfare.

Ms Wardle-Jackson was admitted as a minor patient to Porirua Hospital about four different times, as well as spending six weeks at Oakley Hospital, between 1967 and 1973, and was just 14 years old at her first admission. While in psychiatric hospital care she suffered physical assaults, was administered ECT and given Paraldehyde as punishment, she was secluded as a punishment and was also sent to F Ward as a punishment. She witnessed other patients being assaulted, and was tattooed, made to work, smoked cigarettes, and was deprived of a good education while she resided at Porirua Hospital. She was discharged from the care of the Superintendent in about February 1971.

Ms Wardle-Jackson will discuss her experience in settling claims against the Salvation Army, Ministry of Social Development and Ministry of Health between 2004 and 2017.

Annasophia Calman

Ms Calman suffered physical and sexual abuse and neglect early on in life while growing up in her family home. While she first came to State notice in approximately May 1961, it took six years before complaint action was finally taken because of the detrimental home environment, but she remained in the family home under supervision. In 1969 complaint action was taken again and Ms Calman became a State Ward. She was placed in Nazareth House in Christchurch from 1969 to 1972 where she suffered physical and psychological abuse. In 1972 Ms Calman was placed with the first of several foster families, and was sexually and physically abused in these placements. She was placed back with her father where she suffered physical abuse and neglect, before a further placement in foster care until she was discharged from State care in September 1976.

Ms Calman has been diagnosed with depression and PTSD. In recent years she has written a book about her experiences. She will discuss her claim for redress - her claim documents were sent to the Ministry of Social Development on 4 August 2015. She is still waiting for a response.

Judge Andrew Becroft

The Children's Commissioner will cover the following topics on behalf of the Office of the Children's Commissioner.

Overview of the Functions of the Office of the Children's Commissioner

- The Children's Commissioner has a statutory role as the independent monitor of policies and practices provided under the Oranga Tamariki Act 1989.
- We are also a designated National Preventive Mechanism (NPM) responsible for monitoring New Zealand's compliance with the United Nations (UN) Convention against Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT) in relation to Oranga Tamariki residences. This gives the Commissioner for Children the mandate to monitor all care and protection and youth justice residences as well as other places of child and youth detention across Aotearoa New Zealand.

- As the independent monitor of Oranga Tamariki since 1989, the Office of the Children's Commissioner could also be subject to review for inadequate discharge of the monitoring function within the scope of the Royal Commission inquiry.

The Role of an Effective Independent Monitor

- Oranga Tamariki provides services to approximately 30,000 children and young people daily. Approximately 6,400 are currently in the care or custody of Oranga Tamariki.
- The Government announced changes to the oversight of the State care system, including the roles of the Office of the Children's Commissioner and the Ombudsman, in April this year. The role and functions of the future Independent Monitor (which may or may not remain within the Office of the Children's Commissioner) are currently being designed by Government.
- Current resourcing requires the Office of the Children's Commissioner to be very selective about what we monitor and how. The independent monitor, the Office of the Children's Commissioner, has never been resourced to fully discharge its monitoring functions. An effective independent monitor is necessary to help prevent, address and eliminate abuse of children and young people in State care.

There is an Obligation to Get It Right This Time

- A number of previous reports and inquiries have investigated the abuse of children in State care and made recommendations to safeguard children now and into the future. Previous reports include a particular focus on Māori children in Puao-Te-Ata-Tu in 1988, and disabled children and adults in a Human Rights Commission Report in 2017.
- The Children, Young Persons, and their Families Act 1989 had the potential to achieve the vision outlined in Puao-Te-Ata-Tu. This vision has still not been realised.
- Section 7AA was introduced to the Oranga Tamariki Act 1989 on 1 July 2019. There is now a statutory obligation that makes explicit what has always been implicit, that the Crown honour its Te Tiriti obligations for children in State care.

A Child-Centred Complaints Mechanism is Necessary in the Current System

- Complaints mechanisms that children and young people in care trust and can readily access need to be developed as soon as possible.
- It should be noted that due to the coercive nature of State care any complaints mechanism can never be truly accessible for children and young people.

The Scope of the Royal Commission Should be Interpreted Broadly to Extend to Today

- Recent figures released by Oranga Tamariki show a continuing picture of abuse of children and young people in State care. The Royal Commission needs to use its discretion to inquire into both historical and current abuse of children and young people in State care.
- Recommendations from this inquiry should be forward-focused to ensure the protection from abuse of children and young people now and into the future.

Mike Ledingham

Mr Ledingham will give evidence about the abuse he and his two brothers experienced at the hands of a priest while students at St Joseph's Catholic School in Onehunga (as detailed more fully in the published book "The Catholic Boys"). He will outline the effects of the abuse on him and his brothers, the impacts on his life, choices and opportunities, and the response of the Catholic Church when they were notified of the abuse against the three brothers in 2002. Mr Ledingham will ask the Royal Commission to hold the Catholic Church accountable, and suggests some recommendations the Royal Commission could consider.

Emeritus Professor Des Cahill and Dr Peter Wilkinson

Professor Cahill and Dr Wilkinson will address the following issues in their presentation:

1. A summary of the various international Government-sponsored and Church-sponsored inquiries into child sexual abuse by Catholic priests and other religious groups since 1985 when the first such inquiry was held in the US, and the care and safeguarding initiatives that resulted, as well as their findings and recommendations;
2. A summary of Volume 16, Books 1 – 3 of the Report of the Australian Royal Commission into Institutional Responses to Child Sexual Abuse which dealt with religious institutions, especially the Catholic Church, the Anglican Church, the Orthodox Jewish community, and the Jehovah's Witnesses. This includes addressing how the care mechanisms failed where the needs of religious personnel were placed ahead of those of the victims;
3. An explanatory roadmap to understanding the very complex phenomenon of clerical sexual abuse of children and vulnerable adults and the various constellations of intersecting variables that have led to clerical sexual abuse in the Catholic Church. This includes governance structures, such as diocesan autonomy, as well as highlighting the selection of candidates for priesthood, issues relating to seminary training, and the inculcation of clericalism;
4. Prevalence data into clerical sexual abuse, drawing on Australian, German and US data sources, as well as sexual abuse in other religious institutions, especially in the Anglican Church, the Salvation Army and amongst the Jehovah's Witnesses;
5. A reflection on the New Zealand context and the similarities and differences with comparable nations; and
6. The possible ways forward based on a survey of recommendations made to date.