

C A N A D A

**PROVINCE DE QUÉBEC
DISTRICT DE MONTRÉAL**

(Recours Collectif)
C O U R S U P É R I E U R E

NO ::

503
06-000362-067

**A.B.T. resident of the City of Vancouver,
British Columbia, herein electing domicile for
purposes of these proceedings c/o the
Prothonotary 1, Notre-Dame East, Montreal,
Quebec, H2Y 1B6**

Petitioner

-vs-

**BISHOP'S COLLEGE SCHOOL, legal entity,
carrying on business as "Bishop's College
School", at 80 Moulton Hill, Town of
Lennoxville, Province of Quebec, J1M 1Z8**

Respondent

**PETITION FOR AUTHORIZATION TO INSTITUTE A CLASS ACTION AND
TO OBTAIN THE STATUS OF REPRESENTATIVE
(Articles 1002 etc. C.c.p.)**

**TO ONE OF THE HONOURABLE JUDGES OF THE SUPERIOR COURT,
SITTING IN AND FOR THE DISTRICT OF MONTREAL, PETITIONERS
RESPECTFULLY SUBMIT THE FOLLOWING:**

BACKGROUND AND LEGAL CLAIMS

1. Petitioner A.B.T. (the "student representative Petitioner") on his own behalf and on behalf of all student class members (the "student class members"), hereby seeks authorization of the Superior Court to file the following claims against the Respondent:
 - (a) compensation and damages for breach of trust, breach of fiduciary duties, negligence, assault and damages for willful and wanton and vexatious intentional perpetration of mental distress resulting from the conduct of the employee of the Respondent, Rev. Harold Theodore

Gibson Forster ("Forster"), mental, emotional and sexual abuse of the student representative Petitioner and student class members in the sum of \$13 million;

- (b) Compensation for breach of trust, negligence for hiring, employing and inadequately supervising its personnel, including Forster, and in employing Forster, and more generally, in failing to protect the interests of the student representative Petitioner and other student class members and for the intentional, or, in the alternative, negligent infliction of mental distress occasioned as a result of Bishops College School's failure to assist and protect the student representative Petitioner and student class members from the abuse perpetrated upon them by Forster, in the amount of \$13 million;
 - (c) Damages for liability in hiring, employing and inadequately supervising Forster and failing to protect the interests of the student representative Petitioner and student class members in the amount of \$13 million;
 - (d) Damages for the Respondent's breach of duty of care in the amount of \$13 million;
 - (e) Punitive and exemplary damages in the sum of \$4 million;
 - (f) Aggravated damages in the amount of \$2 million;
 - (g) Special damages in a sum to be determined at the eventual trial after authorization;
 - (h) Interest and additional indemnity in virtue of the Quebec Civil Code.
2. The Petitioner, A.B.T., on behalf of himself and on behalf of other class members claims as follows:
- (a) Damages for loss of care, guidance and companionship and pecuniary loss;
 - (b) Interest and the additional indemnity in virtue of the Quebec Code Civile;
 - (c) Legal fees and costs to be assessed at trial;
 - (d) Such further and other relief as this Honourable Court may deem just and reasonable in the circumstances.

3. Petitioner A.B.T. currently resides in the City of Vancouver, in the Province of British Columbia and was a student at Bishops College School;
4. That the Respondent Bishop's College School, carrying on business as "Bishop's College School" (alternatively, "BCS" or "Bishops"), is a corporation incorporated pursuant to the laws of the Province of Quebec;
5. BCS was, at all material times, an independent college preparatory boarding school for boys in grade 4 through grade 12 in Lennoxville, Quebec;
6. That during all pertinent periods, Rev. Harold Theodore Gibson Forster ("Forster") was employed by the Respondent as a house master, school chaplain, teacher, choirmaster, employee, servant and agent of Respondent;
7. That the Respondent was founded in 1838 and claims to have a tradition of "achievement, vision and excellence";
8. The "Student Class Members" (represented by A.B.T.) are all persons who were sexually, physically and/or mentally abused by Forster and other employees, servants, agents of Respondent while attending BCS;
9. Forster, at all pertinent times, used and exploited his position of authority and supervisory capacity to cultivate an inappropriate and harmful relationship with A.B.T. in order to manipulate and lure A.B.T. and other Student Class Members, so as to perpetrate acts of sexual, physical and/or mental abuse on them;
10. Forster was employed by BCS from April 1953 to July 1962 except 1960. Forster was house master of School House and School Chaplain of BSC for several of those years;
11. School House was the building in which only first year boys in grade 8 were boarded. It was also the building in which Forster had a residential suite;
12. Petitioner A.B.T. resided in School House from 1960 to 1962;
13. Petitioner A.B.T. attended BCS as a student for grades 6 through 11, from September, 1958 to June, 1965;
14. Late one evening, in or about February 1962, when A.B.T. was 14 years old. Forster instructed A.B.T. to wake him in his private suite at 6:15 a.m. the next morning. A.B.T. did as Forster instructed. Upon arriving at Forster's suite, Forster told A.B.T. to come into his bedroom where Forster was still in bed. While A.B.T. was standing in front of Forster, next to Forster's bed, Forster removed A.B.T.'s pajama bottoms and put A.B.T. on his lap and proceeded to

repeatedly beat A.B.T.'s bare buttocks with a hairbrush or clothes brush, while making peculiar sounds with his mouth. Forster then put the brush down and massaged A.B.T.'s buttocks with his hand for a time. Without saying anything further, Forster suddenly told A.B.T. he could leave. Forster engaged in the same or strikingly similar conduct relative to the other Student Class Members;

15. A few weeks later, in or about February or March of 1962, Forster again assaulted A.B.T. in the same manner as above;
16. A.B.T. specifically states that Forster seized upon his and other Student Class Members' vulnerability, which included their small stature, inexperience and young age and his position of dominance as a teacher, administrator and school master of School House, and employee of BCS, with authority to dispense favours, benefits, inducements, punishment, including corporal punishment and discipline, thereby creating an environment in which sexual assault, physical and/or mental abuse of A.B.T. and other Student Class Members prevailed on a regular basis. The time during which this abuse was occurring was one of fright, shock, confusion, shame and frustration. A.B.T. feared that others would discover the abuse. A.B.T. states that he was unable to disclose the abuse at an earlier time, given his fear, embarrassment and denial. He also felt alone, awkward and confined to secrecy, given the situation. At the time the abuse was occurring, A.B.T. feared ridicule and embarrassment from his friends and peers and, as such, he attempted to hide same from persons around him. It was very painful for him to think about, let alone speak of the abuse;
17. A.B.T. maintains that Forster's conduct and actions in these circumstances has caused him to develop certain psychological mechanisms in order to survive the trauma of the abuse, including denial, disassociation and guilt. A.B.T. has repressed some, but not all, of the memories of the sexual abuse and the emotions associated with it. Even to this day, he partly blames himself for the occurrence of the abuse;
18. Subsequently, in or about March, April or May of 1963, A.B.T. was approached by two younger students who were aware of a third younger student whom had been assaulted by Forster in much the same fashion as Forster had assaulted A.B.T. A.B.T. reported to a school official and to his father, Forster's assault of the third younger student. A.B.T. was too embarrassed to report Forster's assaults on him. As a consequence of A.B.T.'s reporting Forster's assault of the younger student, BCS terminated Forster's employment with the school but not until 6 to 8 weeks later at the end of the school year - leaving A.B.T. to have to daily confront Forster and be subject to his humiliation including being the subject of his Sunday sermons. These were the most intimidating and frightening weeks of A.B.T. life;

19. As a chief consequence of the abuse, A.B.T. did not initially undergo any therapy or other psychiatric treatment. He still does not understand/appreciate the full extent of the damage caused to him by the assaults committed by Forster and the damages caused by the same;
20. As a direct result of the relationship that developed between Petitioner A.B.T. and other Student Class Members, on the one hand, and Forster, on the other hand, they became dependent on Forster and vulnerable to Forster to such an emotional extent that Forster owed A.B.T. and the other Student Class Members a special duty of care and fiduciary duties as follows:
 - (a) Not to be sexually, physically, or emotionally abusive;
 - (b) Not to use the relationship to satisfy his own sexual desires;
 - (c) Respect and dignity and privacy of their person;
 - (d) Such further and other duties as may be advised to the Court at or prior to trial;
21. That Petitioner A.B.T. and the other Student Class Members maintain that Forster's aforesaid actions constitute a breach of trust, negligence and assault upon their person. The conduct of Forster was intentional, malicious and was done with the knowledge that it would cause them to suffer humiliation, indignity, physical, emotional and mental distress and injury and general damages to their person;
22. Further, Forster's conduct was done with the knowledge that A.B.T.'s and all other Student Class Members' emotional and physical anguish would increase, and was done in wanton, careless and willful disregard to the consequences to them. Forster's conduct was harsh, vindictive, malicious and reprehensible. Such conduct is offensive to, and in violation of the ordinary standards of decent conduct in the community which ought to be deterred, and is deserving of full condemnation, punishment and compensation;
23. Petitioner claims and pleads that BCS is responsible for the acts and conduct of its employees, in this case Forster and others, and BCS is negligent in that:
 - (a) Forster was an employee, servant or agent of BCS, and by placing him in a position of trust and authority, BCS facilitated Forster's capacity to do wrong, and without that position and authority, that wrong could have been prevented against Petitioner A.B.T. and all Student Class Members;

- (b) Forster was a teacher, housemaster and Chaplain at BCS from 1953 to 1962 except 1960;
 - (c) Forster inflicted the abuse during the course of his employment;
 - (d) Forster's position with BCS was such that BCS could foresee that occupying that position could result in Forster exercising control of the youths in the school, and provide him with an opportunity to commit sexual, physical and emotional abuse;
 - (e) BCS knew, or ought to have known, of Forster's actions involving A.B.T. and other male youths, including the Student Class Members. Prior to the attack upon A.B.T. BCS was aware, or should have been aware, that Forster and other pedophiles had engaged in illegal and abhorrent sexual and physical and mental practices with male youths at BCS. Forster had exhibited a similar pattern of behaviour, with other male youths, and this pattern was known to, or should have been known by, Forster's superiors and fellow employees at BCS;
 - (f) BCS failed to adopt proper or adequate hiring practices to ensure that persons such as Forster would not be hired;
 - (g) BCS knew, or ought to have known of Forster's conduct relative to A.B.T. and the other Student Class Members;
 - (h) BCS did not provide proper, adequate or effective training or monitoring, initially, or on an ongoing basis, to ensure that Forster was suitable and fit to act as an employee of BCS;
 - (i) BCS did not adequately, or at all, monitor the performance and behaviour of Forster to ensure that his performance and behaviour were such as a qualified, reasonable and prudent employee of BCS would exhibit;
24. In addition to the foregoing, Petitioner claims that BCS is liable for the acts and conduct of Forster, and/or negligence by reason of:
- (a) Forster's status as a Chaplain, administrator, teacher and employee of BCS constituted a deemed acceptability and suitability and fitness of Forster for those positions, upon which A.B.T. and each Student Class Member relied, and had every reason to rely on;
 - (b) BCS knew, or ought to have known, that Forster was not suitable or fit to be employed at BCS, given the presence of males of an impressionable age;

- (c) BCS knew, or ought to have known, that Forster was a pedophile or a person with abhorrent tendencies who engaged in illegal and immoral sexual and other activities with young boys who were under his supervision or otherwise;
 - (d) BCS knew, or ought to have known, of Forster's actions and took no steps to have him removed;
 - (e) BCS failed to provide the leadership and due care by not implementing or enforcing guidelines on sexual, physical and mental abuse, thereby causing to Petitioners and the Class Members damages, inclusive of the continuation and exacerbation of said damages. BCS failed to warn potential victims of sexual, physical and mental abuse, such as A.B.T. and the other Student Class Members, that there was a risk that Forster might commit sexual assault and battery and cause mental distress;
25. In addition to the foregoing, Petitioner claims liability against BCS on the following basis:
- (a) BCS did not provide regular, proper or effective training, teaching guidelines or monitoring of Forster adequately or at all, to ensure that BCS was operating in accordance with an institution holding itself out as a Private Boy's Boarding School;
 - (b) BCS failed to respond properly or in a timely fashion, nor did it take appropriate steps to protect potential victims, such as A.B.T. and the other Student Class Members, when information was obtained that Forster might be committing sexual assault, battery and emotional abuse. Furthermore, when sexual assaults, battery and emotional abuse of other complainants by employees, servants or agents of BCS were discovered, BCS failed to undertake an investigation, or otherwise ensure that there were no victims or perpetrators;
26. Your Petitioner A.B.T. states that as a result of the relationship between him and the other Student Class Members, on the one hand, and Forster, on the other hand, A.B.T. and the other Student Class Members became dependent upon, and vulnerable to Forster, to the extent that BCS owed A.B.T. and the other Student Class Members a special duty of care and of a fiduciary duty to:
- (a) Ensure that its teachers and employees and agents were effectively and adequately monitored and trained;
 - (b) Ensure that its teachers, employees and agents were not sexually, physically or mentally abusing its students;

- (c) Ensure that that students were adequately protected from those in positions of authority;
 - (d) Not to employ Forster and the other employees and agents;
 - (e) Such further and other breaches as may be advised in the future;
27. That your Petitioner states that the action, inaction and omissions of BCS as aforesaid, constitute breach of trust and negligence, in hiring, employing and inadequately monitoring Forster and in failing to protect A.B.T. and the other Student Class Members' interests;
28. Petitioner maintains that the conduct of Forster and BCS, in general, is reprehensible and is conduct which should be deterred and the Petitioner A.B.T. and the other Student Class Members are, therefore, entitled to punitive and exemplary damages;
29. Your Petitioner pleads that BCS owed a duty to Petitioner A.B.T. and all other Student Class Members to ensure that they were reasonably safe while on the premises and in the presence of Forster, and that BCS breached its duty of care, the particulars of which have been detailed hereinabove;
30. That as a result of the abuse, Student Class Members have encountered difficulty with females sexually. They have become alienated from their family members, and their relationships with them have been adversely affected because of the said sexual, physical and emotional abuse;
31. As a result of Forster's actions as aforesaid, A.B.T. and/or the other Student Class Members have suffered serious and permanent injuries and general and special damages for which the Respondent is at law responsible, including, though not limited to, the following:
- (a) Ongoing, severe emotional and psychiatric hospitalization and professional counseling which continues to this day;
 - (b) Numerous attempts at suicide;
 - (c) Inability to sleep;
 - (d) Recurring nightmares;
 - (e) Difficulty in developing and maintaining healthy and meaningful interpersonal relationships;
 - (f) Inability to trust other individuals;

- (g) Emotional and mental distress;
 - (h) Low self-esteem;
 - (i) Major depression;
 - (j) Failed relationships;
 - (k) Problems with authority figures, leading to conflicts with employers;
 - (l) Lack of self-confidence;
 - (m) Inability to complete formal education;
 - (n) Loss of faith in organized religion;
 - (o) Substance abuse;
 - (p) Loss of income;
 - (q) Such further and other damages as may be advised in the future;
32. That as a result of the assault upon their childhood innocence, physical safety, integrity and mental well-being, the experiences have left A.B.T. and/or Student Class Members emotionally and mentally scarred with the inability to properly function as a person, man, husband, parent and son or brother;
33. Petitioner A.B.T. and the other Student Class Members as a result of the above-described acts and omissions, have a general anxiety disorder and have suffered post-traumatic stress disorder;
34. As a consequence of these experiences, A.B.T. and other Student Class Members have been put to medical expense and will require therapy and medical attention;

CLASS ACTION

35. The Petitioner A.B.T. wishes to institute a class action on his own behalf and on behalf of all Student Class Members forming part of the group comprised as follows:
- (a) "All students of Bishops College School who were the victims of the breach of trust, sexual assault, physical assault and mental abuse

perpetrated by the Respondent's employee Harold Forster and damaged therefrom",

36. The personal claims of the Petitioner against the Respondent are based on the following facts:
- 36.1 Petitioner A.B.T. currently resides in the City of Vancouver, Province of British Columbia and was a student at Bishops College School;
 - 36.2 Respondent Bishop's College School, carrying on business as "Bishops College School" ("BCS"), is a corporation incorporated pursuant to the laws of Quebec;
 - 36.3 BCS was, at all material times, an independent College preparatory school for boys in grade 4 through grade 12, located in Lennoxville, Quebec;
 - 36.4 At all material times, Harold Forster ("Forster") was a teacher, housemaster, Chaplain, choirmaster, employee, servant or agent of the Respondent;
 - 36.5 The Respondent was founded in 1838, and claims to have a tradition of "achievement, vision and excellence";
 - 36.6 The Student Class Members are all persons who were sexually, physically and/or mentally abused by Forster and other employees, servants or agents of BCS while they were students at BCS;
 - 36.7 Forster used his position of authority and supervisory capacity in order to cultivate an inappropriate relationship with A.B.T. in order to manipulate and lure A.B.T. and the other Student Class Members for the sole purpose of furthering his relationship with A.B.T. and the other Student Class Members, so as to perpetrate acts of sexual, physical and/or mental abuse on them;
 - 36.8 Petitioner A.B.T. attended BCS as a student for grades 6 to 11, from 1958 to 1965. Starting in or about 1962 when A.B.T. was 14 years old, Forster assaulted A.B.T. by purporting to impose corporal punishment on A.B.T. in Forster's private suite at BCS by beating A.B.T. using an hairbrush or clothes brush on A.B.T.'s bare buttocks. Forster also massaged A.B.T.'s buttocks with his hand. While engaged in such conduct, Forster was sexually aroused;
 - 36.9 In addition to the sexual assault by Forster, Petitioner A.B.T. was also sexually assaulted by a head boy when A.B.T. was in grade 8:

- a) Petitioner A.B.T. reported the sexual assault by the head boy to school authorities;
 - b) Despite such report, the Respondent did not expel the head boy and, in fact, permitted said head boy to continue in his position of head boy. He also was allowed to return the following year with more authority and influence as a prefect. The said head boy/prefect continued his sexual activities;
 - c) Petitioner A.B.T. maintains that Forster seized upon A.B.T.'s and other Student Class Members' vulnerability, which included their small stature, inexperience and young age, and Forster's position of dominance as housemaster, teacher and employee of BCS, with authority to dispense favours, benefits and inducements, thereby creating an environment in which to sexually, physically and mentally abuse A.B.T. and the other Student Class Members;
- 36.10 Petitioner A.B.T. maintains that Forster seized upon A.B.T.'s and other Student Class Members' vulnerability, which included their small stature, inexperience and young age, and Forster's position of dominance as housemaster, teacher, Chaplain, and employee of BCS, with authority to dispense favours, benefits and inducements, thereby creating an environment in which to sexually, physically and mentally abuse A.B.T. and the other Student Class Members;
- 36.11. The time during which this abuse was occurring was a time when A.B.T. felt scared, shocked, confused, disoriented, frustrated and ashamed. He was afraid that others would find out about the abuse. A.B.T. states that he was unable to disclose the abuse at an earlier time given his fear, embarrassment and denial, which was part of his medical problem arising from the wrongdoing of Forster. A.B.T. felt alone, awkward and confined to secrecy given the situation. At the time the abuse was occurring, A.B.T. feared ridicule and embarrassment of his friends and peers and, as such, he attempted to hide same from persons around him. It was very painful for him to think about, let alone speak about the abuse. A.B.T. pleads that Forster's conduct and actions in these circumstances, have caused him to develop certain psychological mechanisms in order to survive the trauma of the sexual, physical and mental abuse, including denial, repression, disassociation and guilt. A.B.T. has repressed some, but not all, of the memories of the sexual, physical and mental abuse and the emotions associated with such conduct. Even to this day, A.B.T. partly blames himself for the occurrences of sexual, physical and mental abuse. It was impossible for A.B.T. to act sooner given his medical condition and the traumatic impact of the events that happened to him;

- 36.12. As a direct consequence of the said abuse, A.B.T. did not initially undergo any therapy or any other psychiatric treatment. He still does not understand/appreciate the full extent of the damages caused to him by the assaults committed by Forster and other employees or agents of BCS;
- 36.13 As a result of the relationship that developed between the Petitioner A.B.T. and the other Student Class Members, on the one hand, and Forster on the other hand, they became dependent upon Forster and vulnerable to Forster to such an emotional extent, that Forster owed A.B.T. and the other Student Class Members a special duty of care and fiduciary duties as follows:
- (a) Not to be sexually, physically or mentally abusive;
 - (b) Not to use the relationships to satisfy his own desires;
 - (c) Respect and dignity and privacy of their person;
- 36.14 Petitioner A.B.T. and the other Student Class Members state that Forster's aforesaid actions constitute a breach of trust, negligence and assault upon their person. Forster's conduct was intentional, malicious and was done with the knowledge that it would cause them to suffer humiliation, indignity, physical, emotional and mental distress and injury. Further, Forster's conduct was done with the knowledge that A.B.T.'s and the other Student Class Members' emotional and physical anguish would increase, and was done with wanton, careless and willful disregard to the consequences to them. Forster's conduct was harsh, vindictive, malicious and reprehensible. Such conduct is offensive to the ordinary standards of decent conduct in the community which ought to be deterred, and is deserving of full condemnation and punishment;
- 36.15 Petitioner claims that BCS is responsible for the acts and conduct of its employees and agents, including Forster, and BCS is negligent in that:
- (a) Forster was an employee, servant, or agent of BCS, and by placing him in a position of trust and authority, BCS facilitated Forster's capacity to do wrong, and without that position and authority, the wrongs against Petitioner A.B.T. and the other Student Class Members could have been prevented;
 - (b) Forster inflicted the abuse during the course of his employment;
 - (c) Forster's positions with BCS were such that BCS could foresee that occupying those positions could result in Forster exercising control over youths in the school, and provided Forster with the opportunity to commit sexual, physical and mental abuse;

- (d) BCS knew, or ought to have known, of Forster's actions involving A.B.T. other male youths, including Student Class Members. Prior to the attacks upon A.B.T., BCS was aware, or should have been aware, that Forster and other employees, servants and agents had engaged in illegal and abhorrent practices with male youths at BCS. Forster had exhibited a similar pattern of behaviour with other male youths and his pattern was known to, or should have been known by, Forster's superiors and fellow employees at BCS;
 - (e) BCS failed to adopt proper or adequate hiring practices to ensure that persons such as Forster would not be hired;
 - (f) BCS knew, or ought to have known, of Forster's relationship with A.B.T. and the other Student Class Members;
 - (g) BCS did not provide proper, adequate or effective training or monitoring, initially, or on an ongoing basis, to ensure that Forster was suitable and fit to be an employee of BCS;
 - (h) BCS did not adequately, or at all, monitor the performance and behaviour of Forster to ensure that his performance and behaviour were such as a qualified, reasonable and prudent employee of BCS would exhibit;
- 36.16. In addition to the foregoing, Petitioner claims that BCS is liable for the acts and conduct of Forster and/or negligent by reason of:
- (a) Forster's status as an employee, servant or agent of BCS constituted a reconfirmation and public acknowledgment of suitability and fitness of Forster for his positions, upon which A.B.T. and each Student Class Member relied;
 - (b) BCS knew, or ought to have known, that Forster was not suitable or fit to be employed at BCS, given the presence of males of an impressionable age;
 - (c) BCS knew, or ought to have known, that Forster was a pedophile or a person with abhorrent tendencies, who engaged in illegal and immoral activity with young boys who were under his supervision or control;
 - (d) BCS knew, or ought to have known, of Forster's above noted actions and took no steps to have him removed;

- (e) BCS failed to provide the leadership by not implementing, or not enforcing guidelines on sexual, physical and mental abuse, thereby causing Petitioner's and Class Members' damages to begin, continue and to be exacerbated over time;
- (f) BCS failed to warn potential victims of sexual, physical and mental abuse, such as A.B.T., that there was a risk that Forster might commit sexual, physical and/or mental abuse;

36.17. That in addition to the foregoing, Petitioner claim liability as against BCS for the following reasons:

- (a) BCS did not provide regular, proper, effective training, teaching, guidelines or monitoring of Forster adequately, or at all, to ensure that BCS was operating in accordance with, and as, an institution holding itself out as a residential Private Boys' School;
- (b) BCS failed to respond properly, nor did it take appropriate steps to protect potential victims, such as A.B.T. and other Student Class Members, particularly when information was obtained that Forster might be committing sexual assault, battery and mental abuse. Furthermore, when the sexual, physical and mental abuse of other complainants by employees, servants or agents of BCS was discovered, BCS failed to undertake an investigation, or otherwise ensure that there were no other victims or perpetrators;

36.18. Petitioner A.B.T. states that as a result of the relationship between him and the other Student Class Members, on the one hand, and Forster, on the other hand, A.B.T. and the other Student Class Members became dependent upon and vulnerable to Forster to the extent that BCS owed Petitioner A.B.T. and other Student Class Members a duty of care of a fiduciary nature to:

- (a) Ensure that its teachers, administrators, employees, servants and agents were effectively and adequately monitored and trained;
- (b) Ensure that its teachers, administrators, employees, servants and agents were not sexually, physically or mentally abusing students;
- (c) Ensure that the students were adequately protected from those in positions of authority;
- (d) Not to employ Forster and other teachers, administrators, employees, servants and agents committing sexual, physical or mental abuse of students;