# Limitation Law in Child Sexual Abuse Cases – Government Response to Consultation



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Response to consultation carried out by the Ministry of Justice.

This information is also available at https://consult.justice.gov.uk/

### Content

Introduction and contact details	2
Complaints or comments	2
Ministerial Foreword	3
Background	4
Summary of responses	5
Responses to specific questions	6
Impact Assessment, Equalities and Welsh Language	18
Impact Assessment	18
Equalities	18
Welsh Language Impact Test	18
Conclusion and next steps	19
Consultation principles	20
Annex A – List of respondents	21

## Introduction and contact details

This document is the post-consultation report for the consultation paper, "Limitation Law in Child Sexual Abuse Cases".

#### It will cover:

- the background to the report
- a summary of the responses to the report
- a detailed response to the specific questions raised in the report
- the next steps following this consultation.

Further copies of this report and the consultation paper can be obtained by contacting **Limitation Law in Child Sexual Abuse Cases Consultation** at the address below:

Civil Justice and Law Division Postpoint 5.25 Ministry of Justice 102 Petty France London SW1H 9AJ

**Email**: limitationlawconsultation@justice.gov.uk

This report is also available at https://consult.justice.gov.uk/

Alternative format versions of this publication can be requested from limitationlawconsultation@justice.gov.uk

### **Complaints or comments**

If you have any complaints or comments about the consultation process, you should contact the Ministry of Justice at the above address.

## **Ministerial Foreword**

I want to thank all those who have contributed to this consultation especially the victims and survivors who have shared their first-hand experience of the absolute horror of child sexual abuse. I also want to thank the members of the Independent Inquiry into Child Sexual Abuse for their original, in-depth work on this sensitive and important topic.

This Government is determined that the voice of victims and survivors will be heard loud and clear.

To that end, the Government accepts the overwhelmingly expressed view that the limitation period should be removed for claims brought by victims and survivors of child sexual abuse in respect of their abuse.

We agree that this is a special category of case that merits a different approach and its own time limit regime for bringing civil claims, with safeguards to ensure the interests of justice are met.

In addition, the Government also believes that the burden of proof should be reversed in child sexual abuse cases so that an action can proceed unless the defendant can satisfy the court that it is not possible for a fair hearing to take place or that they (the defendant) would be substantially prejudiced were the action to proceed.

The Government believes that combined these measures, as recommended by the IICSA, will make it easier for victims and survivors to achieve the redress which they deserve.

Sarah Sackman KC MP Minister of State, Ministry of Justice

# **Background**

The consultation paper "Limitation Law in Child Sexual Abuse Cases" was published on 15 May 2024. It invited comments on options for the reform of the law of limitation in child sexual abuse cases in England and Wales.

Specifically, it considered the recommendation by the Independent Inquiry into Child Sexual Abuse (IICSA) on limitation law (recommendation 15 in the final report).

It also examined the law of limitation in child sexual abuse cases in other jurisdictions examined by the IICSA and sought views on options, other than the removal of the limitation period, for the reform of limitation law in child sexual abuse cases.

The consultation period closed on 10 July 2024 and this report summarises the responses, including proposed next steps.

There were no substantive comments about the Impact Assessment by those responding to the consultation. However, the Government's preferred options have changed since the Impact Assessment was published during the consultation. The Impact Assessment has therefore been updated to reflect that change.

A Welsh language summary can be found at https://www.gov.uk/government/consultations/limitation-law-in-child-sexual-abuse-cases

A list of respondents is at Annex A.

# **Summary of responses**

- 1. A total of 50 responses to the consultation paper were received. Of these, 15 were from respondents who identified themselves as victims or survivors of child sexual abuse, 19 were from those who identified themselves as being from the legal sector, 4 were from those who identified themselves as being from the insurance sector, 2 identified themselves as being from the local government sector while 10 "others" did not identify themselves as being from any of these groups.
- 2. Responses were analysed for their answers to the specific questions asked. In addition, responses were examined for any recurring themes.
- 3. On the headline question of whether the three-year limitation period for personal injury claims should be removed for claims brought by victims and survivors of child sexual abuse, a substantial majority of respondents were in favour.
- 4. There was also support from the majority of respondents for the burden of proof in child sexual abuse cases to be reversed so that an action would proceed unless the defendant satisfies the court that it is not possible for a fair hearing to take place or that they (the defendant) would be substantially prejudiced were the action to proceed. At present the onus is on the claimant in a case to satisfy the court a fair trial can take place.
- 5. It was a recurring theme that in response to other questions many respondents reemphasised that they thought the limitation period should be completely removed in child sexual abuse cases.
- 6. Many respondents did not offer an opinion, or did not feel able to offer an opinion, on the more technical aspects of the consultation. This included questions on S33 of the Limitation Act, judicial guidance on S33 and whether there should be a Pre-Action Protocol for child sexual abuse claims.

# Responses to specific questions

1. Should the three-year limitation period for personal injury claims be removed for claims brought by victims and survivors of child sexual abuse in respect of their abuse?

This question reflected the recommendation from the IICSA that the current time limit for child sexual abuse claims should be abolished.

A substantial majority of respondents were in favour of the limitation period being removed for personal injury claims brought by victims and survivors of child sexual abuse in respect of their abuse.

This included all respondents who identified as victims or survivors and the majority of respondents from the legal sector and "others" group.

However, all respondents from the Insurance group and local government sector were against removal of the limitation period.

Many of the responses from victims or survivors emphasised the length of time taken to come to terms with the abuse they have suffered and the impact this can have on them. To quote one respondent, "We know from direct experience that the three-year limitation period...can push victims and survivors to a place where they feel the emotional and psychological cost of trying to get over the first hurdle (limitation) is much too high". Another respondent observed, "Removing this three-year limitation will reduce the time pressure on survivors and enable people to develop coping skills and tools to disclose (their abuse) in a way that will not further negatively impact their mental health".

One of the legal sector respondents referred to limitation acting as a "barrier...causing or contributing to survivors accepting out of Court settlements lower than the value of their claim (sometimes substantially so) due to the litigation risk that the Court will decline to exercise discretion to disapply the primary limitation period under Section 33 Limitation Act 1980". In a similar vein, another legal sector respondent stated that "claimants will often choose to settle their cases to avoid the re-traumatisation of a trial.. (and having to explain)..the reasons for their delay and why they have not come forward sooner".

However, the Legacy Claims Committee of the Insurance and Reinsurance Legacy Association (IRLA) claimed in their response that limitation issues are raised only where there is a real risk of prejudice to defendants. As evidence they cited data

showing IRLA members received 1,336 claims in the past 5 years, with only 14 cases taken to trial on issues which included limitation. The limitation defence was then successful in only 11 of these cases.

A number of respondents emphasised the importance of limitation in protecting defendants and ensuring a fair trial. For example, The Personal Injuries Bar Association, endorsed by the Bar Council, supported limitation as a safeguard "to protect defendants (and the Courts) from stale claims". While the Local Government Association stated that "the limitation period provides an important role in the balancing and protection of those rights (to a fair trial)"

### **Government Response**

The Government recognise the strength of feeling on this issue especially amongst victims and survivors of child sexual abuse and is persuaded that the limitation period should be removed for claims brought by victims and survivors of child sexual abuse in respect of their abuse.

While courts currently have the discretion to allow claims to proceed it seems clear that removal of the limitation period would send a clear message of the Government's intent that victims and survivors of child sexual abuse should not have to suffer the further injustice that responses to this consultation show a limitation period may impose.

The Government recognises concerns about ensuring the right of defendants to a fair trial is protected and as recommended by the IICSA, would seek to ensure that any legislative changes in this area expressly recognise the importance of a fair trial.

In addition, the Government also agree with the IICSA's recommendation that this reform should not apply where a case has already been determined or settled in court.

2. Should the burden of proof be reversed in child sexual abuse cases so that an action can proceed unless the defendant can satisfy the court that it is not possible for a fair hearing to take place or that he/she (the defendant) would be substantially prejudiced were the action to proceed?

At present the onus is on claimants in child sexual abuse cases to argue and satisfy the court that a fair hearing would be possible, given the passage of time since the actions giving rise to the claim took place. Most respondents in every category (victims and survivors, Insurance sector, legal sector, local government sector and others), including an overwhelming majority of those who identified as victims/survivors or as being from the legal sector, supported a reversal of the burden of proof as outlined in the question. This would place the onus on defendants rather than claimants as at present.

One typical response from a victim/survivor stated that, "victims of abuse of any kind have not been able to tell their stories without being gaslighted, disbelieved and ejected from families...of course, the burden of proof should be on the defendant".

This was backed up by another response from a victim/survivor which stated, "child sexual abuse...is an imbalance of power" and "moving the burden of proof...would remove one of the barriers for the claimant".

Against reversing the burden of proof, albeit without offering any substantive evidence to back up their claim, one respondent from the local government sector claimed, "There is a risk that (reversing the burden of proof)...would discourage individuals from applying to join the children's workforce".

One respondent from the legal sector, argued that "it remains a key part of natural justice that the burden of proof should rest on the party who seeks to obtain the benefit of the remedy". This was backed up by a response from the insurance sector that "it is right as a matter of principle that any party seeking to disapply limitation should have the burden of proving their case for doing so".

Several respondents supported reversing the burden of proof while indicating that they thought it was illogical to reverse the burden of proof but keep the limitation period.

#### **Government Response**

The Government is grateful for the many responses on this question and notes the strong overall support for reversing the burden of proof in child sexual abuse cases so that an action can proceed unless the defendant can satisfy the court that it is not possible for a fair hearing to take place or that he/she (the defendant) would be substantially prejudiced were the action to proceed.

As indicated in the consultation, the government's position is that it supports this option in view of the exceptional nature of historic child sexual abuse claims. The Inquiry recorded what a harrowing and difficult process this is for victims and survivors who may lack faith in institutions and those in authority to take their claim seriously and objectively. This reform would make that process a little less difficult.

# 3. Should existing judicial guidance (as set out by the Court of Appeal in *Chief Constable of Greater Manchester v Carroll*) be codified in statute?

This question asked respondents whether guidance handed down in a Court of Appeal judgment for judges and courts considering applications for extensions of time limits in child sexual abuse cases should be codified, that is form part of statutory law.

Many of the victims and survivors responding felt that they did not have the legal knowledge to offer a view on this question. Other respondents were clear that they felt the limitation period should simply be removed.

Of those that did respond, most were against codification of the common law guidance (set out in this court judgment) in statute.

There was a majority against codification amongst respondents from the Insurance sector, the legal sector and those identifying as victims/survivors. Most of those from the "others" group were in favour of codification, while respondents from the local authority sector were divided on whether judicial guidance should be codified.

One legal sector respondent in favour of codification argued that "codifying the current position would remove the uncertainty of common law and protect survivors". While even a respondent from the victims sector who was against codification accepted that "codifying the existing judicial guidance could provide clarity and consistency in how courts handle child sexual abuse cases".

However other respondents felt that codification was not needed, there would be "no benefit to codifying existing judicial guidance" according to one respondent from the legal sector or such a move risked fettering judicial discretion (an issue which was specifically identified by several respondents from the legal sector).

### **Government Response**

As indicated above, the Government now intends to remove the limitation period for claims brought by victims and survivors of child sexual abuse in respect of their abuse. Therefore, this option will not be pursued.

In any event, the guidance remains part of the common law and courts will therefore continue to take it into account when considering claims of this nature.

4. What additional factors, if any, should be included in judicial guidance about S33? Please refer to relevant cases when suggesting additional factors.

Section 33 (of the Limitation Act 1980) sets out various factors a court should take into account when considering applications to extend a time limit for personal injury claims beyond the normal three-year period. This question sought views from respondents on whether other factors should be considered and added.

Many of the responses, especially from those identifying as victims or survivors, made no comment on this question. Many of the other responses simply reiterated that they would like to see the limitation period removed for child sexual abuse cases.

Substantive replies included a suggestion that "conduct by associates or agents also need to be taken into account".

Two responses from the legal sector made the point, which the Government supports, that ensuring a fair trial can take place is key. To that end, the respondent suggested amending S33(3) of the Limitation Act 1980 so that a claim "should be permitted to proceed unless the defendant can show that a fair trial is not possible".

Another legal sector response suggested that S33 be amended so that the overriding factor to be considered by the court is the reason for the delay, on the claimant's part, in bringing the claim. Where compelling and/or salient reasons are provided this should "serve to extinguish any prejudice to the defendant".

### **Government Response**

On consideration of all the responses on this point, the Government is content that no additional factors should be included in judicial guidance about S33. Furthermore, as previously outlined the Government now intends to remove the limitation period for claims brought by victims and survivors of child sexual abuse in respect of their abuse.

5. If there were to be changes to limitation law or judicial guidance for child sexual abuse cases, should claims that have already been adjudicated or settled be allowed to be reopened?

This question sought views on whether any reforms should have retrospective effect – in other words enable old cases to be reopened using the new provisions – for example a case that had failed on the grounds of a limitation challenge.

Of those who expressed an opinion, it was fairly evenly balanced between those in favour and those against allowing claims already adjudicated or settled to be reopened. Indeed, one respondent even argued both for and against in their response.

The largest group of respondents in favour of allowing claims to be reopened were those identifying as victims or survivors. One victim/survivor stated that "getting justice is so important and shouldn't be underrated...(victims) have already been failed by the justice system. An opportunity to correct this should be given".

Another victim stated that "victims of child abuse are victims for life, and in the past, have been denied justice. If there is any opportunity to offer justice to someone in that position there is a moral duty to offer it". Another victim/survivor claimed that "Earlier child sexual abuse cases may have settled unfavourably for many who are scarred for life. It is correct that they should be allowed to have their claim reopened".

A key point raised by one legal sector respondent was that reopening claims that have already been adjudicated or settled risked survivors potentially being retraumatised if evidence is looked at again.

The largest group of respondents against allowing claims to be reopened came from the legal sector. The Insurance sector was also strongly opposed. Typical of the responses received was the claim that "finality and certainty are fundamental aspects of the rule of law and the cornerstone of a fair legal justice system which must be upheld". The importance of certainty and finality was echoed over and over again by respondents opposed to allowing claims to be reopened.

### **Government Response**

The Government agrees with those that have argued that certainty and finality are among the key aspects of the rule of law. Therefore, this option will not be pursued. We also note this was the conclusion which the IICSA came to after their in-depth examination of the issue.

# 6. Should any change to limitation law or judicial guidance apply where the limitation period has expired but claims have not yet been settled or dismissed by a court?

This question sought views on whether claims that have **not** been resolved by the time any reforms to the law in this area have taken effect should be able to take advantage of that new legal regime.

There was overwhelming support from respondents for any change to apply equally where the limitation period has expired but claims have not yet been settled or dismissed by a court. Only four respondents disagreed.

One respondent stated that "if the claim has been issued then it should proceed on the basis of the law at the point proceedings were issued. It would be unfair if the claim had been issued and defended on the basis of the law in place at that time and, say, shortly before trial, the law changed meaning the defendant had incurred significant costs on a defence it no longer had or a defence which required revision at further significant cost"

However, the dominant view was that expressed by another respondent that "Any changes should be applied to claims which have not been settled or dismissed at the time the changes are made".

### **Government Response**

In the interests of equity the Government believes that any change made to the limitation period should apply to all cases that have not yet been settled or dismissed by a court.

# 7. Do you agree that any change to limitation law or judicial guidance should cover child sexual abuse claims only?

This question recognised that other forms of child abuse exist and that some jurisdictions (such as Scotland) have developed a limitation law that covers all such cases, not the more narrow definition of only child sexual abuse claims.

While there was recognition from many respondents that the work of the IICSA was focused on child sexual abuse. Most respondents did not think that any changes should cover child sexual abuse only.

To quote the response from one victim/survivor, "All forms of child abuse have the same devastating impact on victims, whether sexual, physical or psychological". Another victim/survivor response highlighted that "sexual abuse rarely occurs in

isolation". This was backed up by another victim/survivor who described their own experience of "physical abuse with sexual undercurrents".

However, in their report the IICSA itself recommended only "that the limitation period should be removed in all cases involving child sexual abuse" rather than abuse more widely. As has been noted, child sexual abuse was the focus for the Inquiry and the evidence submitted to it and thus the basis for the reforms being explored.

This approach was backed by one respondent who noted "child sexual abuse has implications for its victims and survivors which are not seen in other categories of harm" and another respondent who commented that "the recognised inhibiting effect of child sexual abuse that can lead to delayed reporting does not apply to physical or emotional abuse claims". To quote from another respondent, "child sexual abuse is a category deserving of special rules".

### **Government Response**

The Government is grateful for the points made in response to this consultation and agrees that child sexual abuse is particularly abhorrent. It therefore believes that reforms should be limited to child sexual abuse claims as the case for reform has been comprehensively explored by the Inquiry in this specific group of cases.

# 8. Do you agree that the factors in Section 33 should be adjusted to recognise the particular circumstances around child sexual abuse claims?

The existing factors for courts to consider in Section 33 (of the Limitation Act 1980), when considering applications for an extension, apply across all types of personal injury claim. This question asked whether bespoke factors for child sexual abuse claims only should be included.

Responses were fairly evenly balanced on this question with many responses reiterating the view that the limitation period should be removed completely (rather than adjustments be made to S33 factors).

Around half of those who expressed a view agreed that the factors in S33 should be adjusted to recognise the particular circumstances around child sexual abuse claims while around half did not agree.

s/31216/view/report-independent-inquiry-into-child-sexual-abuse-october-2022\_0.pd

13

<sup>&</sup>lt;sup>1</sup> Paragraph 98, pg 259, IICSA Final Report, https://webarchive.nationalarchives.gov.uk/ukgwa/20221215051709/https://www.iicsa.org.uk/keydocument

Most of the respondents, who expressed a view, from victims/survivors and the local government sector supported S33 being adjusted. While most of those from the Insurance sector, legal sector and others group did not.

One response from a victim/survivors group made the claim that "child sexual abuse is a ...unique type of trauma" and advocated that this should be recognised by adjusting the factors in S33. While a legal sector respondent advocated that "the presumption should be that the claim can proceed unless the defendant can show that a fair trial is not possible".

However, one respondent made the claim that "there is already a significant body of caselaw in this area" and therefore no need for the factors around S33 to be adjusted further. While a respondent from the legal sector claimed that "existing S33 factors are already applied appropriately in child sexual abuse claims".

### **Government Response**

Judicial independence is a key aspect of the legal system in England and Wales and the Government is keen to avoid fettering existing judicial discretion. The Government believes that S33 already offers discretion in cases concerning child sexual abuse claims. Therefore, the Government does not support adjusting the factors in S33 with regard to child sexual abuse claims.

In any event, the core Government reform of removing time limits for child sexual abuse (unless this would prevent a fair trial) means there will be less reliance or use of this part of the legislation.

### 9. Should there be a different limitation period for child sexual abuse claims?

This question explored whether reform should be based on a new time limit for child sexual abuse cases (say 20 or 30 years) as a separate limitation period from other types of personal injury claim.

Many of the responses to this question reiterated previously expressed views that there should be no limitation period or that the limitation period should be "unlimited" (meaning there would effectively be no limitation period).

Most of those identifying as victims or survivors or their representatives were in favour of a different limitation period for child sexual abuse claims. One suggestion was that this should be for the "lifetime of victims" but there were few suggestions, and no consensus, on the length of any new limitation period

While responses from those identifying as being from the legal sector were overwhelmingly against a different limitation period. As several respondents pointed out, any new limitation period would be just as arbitrary as the current one.

### **Government Response**

The Government agrees with most of those who expressed an opinion on this question that there should not be a different limitation period for child sexual abuse claims.

The same issues identified in question one (around whether or not there should be a limitation period for child sexual abuse claims) would still exist even if that period were different for child sexual abuse claims. As the Inquiry itself pointed out this would simply introduce a different but equally arbitrary time limit.

The danger of introducing a fixed period e.g. 30 years is that there are examples where courts have been satisfied on the weight of evidence to allow claims for longer periods, and 30 years (or any other new limitation period) may be seen as a final cut off point.

As stated in response to question one, the Government recognise the strength of feeling on this issue especially amongst victims and survivors of child sexual abuse and is persuaded that the limitation period should be removed for claims brought by victims and survivors of child sexual abuse in respect of their abuse.

### 10. Should there be a specific Pre-Action Protocol for child sexual abuse claims

Pre-action protocols are used in many areas of civil litigation and encourage parties to follow best practice in pursuing disputes, sharing evidence and encouraging engagement. They are recognised as contributing to the prospects of cases being settled or resolved at an earlier stage, or at least narrowing issues in dispute. There is at present no bespoke protocol for child sexual abuse cases and the question sought views on whether one should be developed.

Given the technical nature of this question it is not surprising that many respondents did not give an opinion.

Of those that did offer an opinion, the vast majority supported there being a specific Pre-Action Protocol (PAP) for child sexual abuse claims.

While one respondent from the legal sector "did not see any real benefit to the Pre-Action Protocol (as) no two abuse cases are alike (and) we already have frameworks that help with the Pre-Action process" the overwhelming response from the legal sector was in favour of a PAP for child sexual abuse cases. This included offers from some in the sector to be part of a working party looking at the development of a PAP.

Of those victims/survivors that offered an opinion, most were also in favour of a specific PAP being developed for child sexual abuse claims. To quote one victim/survivor response, "It might make the whole process less traumatic for victims and survivors".

### **Government Response**

Recognising the strong support for a Pre-Action Protocol from those who responded to this question, the Government is sympathetic to the development of a specific Pre-Action Protocol for child sexual abuse claims.

We will consider this further and seek the views of the Civil Procedure Rule Committee and Civil Justice Council.

# 11. What do you consider to be the equalities' impacts on individuals with protected characteristics of each of the proposed options for reform?

Many of the responses to this question offered no specific views on the equalities' impacts of each consultation option or simply reiterated previously expressed views about the removal of the limitation period.

One respondent that did offer a view quoted from the Inquiry`s Truth Project that nearly half (47%) of the individuals who participated in the Truth Project have an illness or condition which may fall within the disability protected characteristic of the Equality Act 2010.

Without providing any additional evidence, another respondent stated that "having a new, extended limitation date could potentially discriminate against male survivors". This was on the basis of research quoted in the consultation document showing a difference in length of time between male and female victims and survivors in making a complaint about their abuse.

Three respondents put forward the similar view that the removal of the limitation period would have a "positive impact" on those with protected characteristics on the basis that it would "create a more level playing field" and remove "an unnecessary barrier".

However, a commonly expressed view was that there would be limited, or no equalities impacts on individuals with protected characteristics.

#### **Government Response**

The Government notes and is grateful for the responses on this question.

# 12. Do you agree that we have correctly identified the range and extent of the equalities impacts under each of the proposals set out in this consultation?

Many of the responses agreed that the correct range and extent of equalities impacts had been identified.

Indeed, one respondent went so far as to observe "This consultation is admirably comprehensive in its treatment of equalities impacts".

Other respondents felt that the equalities impact had not been adequately covered.

Gender dysphoria and neurodiversity were specifically identified as areas worthy of further investigation. One respondent also noted that there was no child rights impact assessment.

### **Government Response**

The Equality Statement which accompanied the consultation followed the standard UK Government process for assessing the equalities impact of proposed new policies. This included consideration of the impact on all the protected characteristics covered in the Equality Act 2010.

# Impact Assessment, Equalities and Welsh Language

### **Impact Assessment**

The Impact Assessment has been updated to reflect the Government's new preferred options.

### **Equalities**

The Equality Statement has been updated to reflect responses received during the consultation.

### **Welsh Language Impact Test**

There were no Welsh language issues raised in relation to the consultation.

The proposed policy approach will apply across England and Wales

# **Conclusion and next steps**

- 1. The Government is grateful to everyone who has responded to this consultation on what is a sensitive and emotive topic. We are particularly grateful to those victims and survivors who have responded and in many cases shared their personal experiences.
- 2. The Government accepts the overwhelmingly expressed view that the limitation period should be removed for claims brought by victims and survivors of child sexual abuse in respect of their abuse.
- 3. In addition, the Government also believes that the burden of proof should be reversed in child sexual abuse cases so that an action can proceed unless the defendant can satisfy the court that it is not possible for a fair hearing to take place or that they (the defendant) would be substantially prejudiced were the action to proceed.
- 4. Recognising the support expressed in the consultation, the Government is also sympathetic to the development of a specific Pre-Action Protocol for child sexual abuse claims.
- 5. As summarised in the responses to the individual consultation questions above, the Government is not persuaded that it should pursue reforms in any of the other areas where options and proposals were presented.
- 6. Removal of the limitation period and reversing the burden of proof in child sexual abuse cases will require primary legislation to implement and the Government will give further consideration on a suitable legislative vehicle to achieve these reforms.
- 7. The Government will engage with the Civil Justice Council and Civil Procedure Rule Committee on the potential development of a specific Pre-Action Protocol for child sexual abuse claims.

# **Consultation principles**

The principles that Government departments and other public bodies should adopt for engaging stakeholders when developing policy and legislation are set out in the Cabinet Office Consultation Principles 2018:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/691383/Consultation\_Principles\_\_1\_.pdf

# Annex A – List of respondents

A total of 50 responses to the consultation paper were received. Of these, 15 were from respondents who identified themselves as victims or survivors of child sexual abuse, 19 were from those who identified themselves as being from the legal sector, 4 were from those who identified themselves as being from the insurance sector, 2 identified themselves as being from the local government sector while 10 "others" did not identify themselves as being from any of these groups.

In addition to responses from individuals, respondents identified themselves as belonging to the following organisations in their responses.

1 Crown Office Row

ACAL (Association of Child Abuse Lawyers)

Article 39

Association of British Insurers

Association of Personal Injury Lawyers

The Bar Council

**Boarding School Survivors** 

Bolt Burdon Kemp LLP

City, University of London; City's Violence and Society Centre; The City Law School

**Deka Chambers** 

Edinburgh Academy Survivors Group

**English Education Consultants** 

FACT - Supporting Victims of Unfounded Allegations of Abuse

**Farleys Solicitors** 

Forum of Complex Injury Solicitors

Forum of Insurance Lawyers

Hodge Jones & Allen

**Imara** 

IRLA - Legacy Claims Committee of the Insurance and Reinsurance Legacy Association Limited

Irwin Mitchell LLP

**Jordans Solicitors** 

Keoghs LLP

Leigh Day

**Lime Solicitors** 

Local Government Association

Loretto School Survivors

Marie Collins Foundation

Municipal Mutual Insurance Limited

Muslim Women's Network UK
National Association for People Abused in Childhood
National Secular Society
Personal Injuries Bar Association
Simpson Millar LLP
Seen and Heard C.I.C
Slater & Gordon Lawyers
The Survivors Trust
Switalskis Solicitors
Thirtyone:eight

UAB Euphoria Imaging Wakefield Council Zurich Insurance



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