

On 16 October 1986, whilst attending my radio operators course at Sale with my Army Reserve regiment, I was informed that I had been placed on the list of candidates for the January 1987 intake at RMC.

On 18 December 1986, I was informed of my acceptance into the January 1987 intake at RMC.

RMC Duntroon

On 12 January 1987 (at age 18), I was enlisted in the Australian Regular Army (ARA) as an officer cadet at Simpson Barracks, Watsonia. The following day I arrived at RMC, Duntroon, with the rest of the civilian entrants from Victoria. I was one of 128 3rd Class Staff Cadets in the January 1987 intake, all of whom were aged between 18½ and 25. At the time I entered RMC there were around 300 senior cadets (1st Class & 2nd Class) there (** The 18-month course at Duntroon was divided into three 6-month "classes" as opposed to the two 6-month "classes" of the 12-month course at the Officer Cadet School, Portsea, that it replaced. I once asked a 1st Class cadet in Kokoda Company, Corporal Gavan CARTER (CSC No 4939) – the last officer cadet from OCS to graduate – "Was Portsea anything like this [Duntroon]?" He instantly, and almost contemptuously, replied, "Portsea was nothing like this!" I must add that I found Corporal CARTER to be the most approachable of all the senior cadets I encountered at Duntroon. As an aside, it is worth noting that OCS Portsea was never the subject of any "bastardization" scandals during its 33-year history.*

The then Commandant of RMC was Major-General Murray BLAKE, AM, MC (** Commandant 1987-90*). The Director of Military Art (DMA) was Colonel Rodney EARLE (** DMA 1985-87*), the Commanding Officer (CO) of the Corps of Staff Cadets (CSC) was Lieutenant-Colonel David KIBBEY (** CO CSC 1986-87*), and the Chief Instructor (CI) of the Military Training Wing (MTW) was Lieutenant-Colonel Simon WILLIS. The RMC Regimental Sergeant Major (RSM) was WO1 J.W. BURNS, OAM.

BLAKE (RMC Class of 1960, CSC No 1755), EARLE (RMC Class of 1964, CSC No 2025), and WILLIS (RMC Class of 1970, CSC No 2565) were RMC graduates. EARLE would retire from the Army as a Brigadier. WILLIS would go on to serve as Commandant of RMC during 1993-95 as a Brigadier, and would retire as a Major-General, AM, CSC, in 2004.

KIBBEY was a graduate of OCS Portsea (OCS Class of 1967). He died in December 2021.

In January 1987, there were approximately 430 cadets at RMC Duntroon, divided into five companies (Alamein, Kapyong, Long Tan, Gallipoli and Kokoda).

I was given the Corps of Staff Cadets (CSC) number 5266 and I was assigned to 45 Section, 15 Platoon, Kokoda Company. Kokoda Company at that time was housed in ANZAC Block in the northeast corner of the college grounds. Kokoda Company consisted of 78 cadets (of which 27 were 3rd Class "junior" cadets) divided into three platoons (13, 14 & 15 Platoons). The majority of senior cadets were ADFA graduates who had started their officer training at the "old" Duntroon.

There were two other 3rd Class cadets in my section, Staff Cadet Steven RIDD (CSC No 5303), who was 22-years-old, and Staff Cadet Christopher WHITTING (CSC No 5336), who was 23-years-old and married with two young children.

The Officer Commanding (OC) of Kokoda Company was Major Todd VERCOE (RMC Class of 1977, CSC No 3312). The ARA Kokoda Company Drill Sergeant was Sergeant Craig A. JORGENSON.

My first week at RMC was spent at the college being issued uniforms, equipment and textbooks, receiving inoculations and being medically assessed, and undergoing other induction procedures. The next four weeks (17 January-9 February 1987) were spent undergoing Initial Corps Training (ICT) at the nearby Majura Field Firing Range, a 3,035-hectare site adjacent to the Canberra airport about 10km from the college.

Initial Corps Training

By the third week at Majura I had become somewhat estranged from the 11 other 3rd Class cadets in my section. The initial cause of the estrangement was my own immature larrikinism (tolerable in a trooper but not acceptable in an officer) (** It should be noted that the image of the larrikin World War I ANZAC digger with his hands in his pockets, his slouch hat*

perched on the back of his head with the chin strap under his bottom lip, and a cigarette hanging from the corner of his mouth, is not one that is acceptable in the modern Australian Army. If an Australian soldier behaved now like they did then, they would be in constant trouble or would most likely be discharged). I displayed my immaturity by asking facetious questions and making "smartarse" remarks in attempts to be funny. For instance, I responded to a number of tactical battlefield problems by suggesting the use of a "human wave attack". The final occasion I made this remark, after a section-level attack across open ground into a tree line, the rest of the section broke into suppressed laughter. Our section instructor, Sergeant Kim HOGAN angrily responded by snapping, "Shut your fuckin' mouth, Knight!" These type of comments drew the approbation of some of the instructors but particularly Sergeant HOGAN, who appeared to take an instant dislike to me due to my Army Reserve background (I never mentioned my previous Army Reserve service, but it was immediately apparent from my seven-digit regimental number - Regular Army enlistees had six digit regimental numbers. He asked me about my Army Reserve service and I told him I had spent a year in an armoured reconnaissance unit as a trooper). His dislike was apparent in his repeated unprovoked disparaging remarks in front of the other cadets regarding my Army Reserve background (e.g. "This idiot spent a year jumping out of the back of trucks"). In a hierarchical, competitive environment like RMC, such comments tended to be instinctively adopted by your peers, much like children in a playground. This occurred less in your presence, than behind your back. When such comments and put-downs become universally accepted the result was that your reputation overshadowed your actual performance. On one occasion I volunteered to lead the section during a contact drill because I wanted to show enthusiasm. I did not do well in giving orders and at the end of the drill Sergeant HOGAN, in front of the section, snapped, "You've never done this!" (led a section attack). I never said I had. I did not respond to his comment and I did not volunteer again.

Sergeant HOGAN also seemed to take an intense dislike to Staff Cadet RIDD. On two occasions I witnessed Sergeant HOGAN manhandle Staff Cadet RIDD; once when he found him reclining during a morning "stand-to", and again when RIDD failed to stop when told to during a contact drill (RIDD did not hear the command due to the noise). On the first occasion I stood up and slowly approached Sergeant HOGAN because I feared he was going to assault Staff Cadet RIDD. Staff Cadet Lynda SHRIMPTON (CSC No 5311) witnessed this

as we were both situated in the centre of the section position. (see Attachment 35) (* Staff Cadet SHRIMPTON was an ex-RAEME lance-corporal. She ended up resigning from RMC in early in 2nd Class and subsequently left the Army).

The most disheartening comment concerning myself occurred around the third week at Majura. I was told in confidence by one member of my section (who I have chosen not to name here) that another member of the section - Staff Cadet WHITTING - had said to the section when I was absent, that I was "trouble" and was "bringing the section down." I recall that after I was told this I sat on my stretcher and looked out over the Majura Range. I remember that it was the loneliest I have ever felt in my life. My isolation from my section was apparent by the end of the ICT during the end of course concert. My section put on a skit without me - I wasn't even told they had been rehearsing one. Staff Cadet WHITTING never made any comment to me about my behaviour. Unfortunately for me, he was also a member of my section at RMC.

Sergeant HOGAN's first Field Report on me noted that I 'constantly asked immature questions' and that I 'tried to present an image of toughness.' He later stated to Victoria Police that, 'Staff Cadet Knight performed adequately with all weapon training, his expertise was probably above average of his peer group. ... In actual training in the field in the rifle group ... for example he was actually leading and he performed well. But in the camp environment and group discussions he had a problem of peer group acceptance because he was constantly making statements about whether the Australian Army minded if officers went over to the trouble spots of the world. I picked this up fairly early with Knight and whereas sometimes this may be a settling problem I could see with Knight that this was going to be an ongoing problem. I spoke to Knight and counselled him about his attitude and interests as he expressed them. My assessment of him was recorded officially and passed on through chain of command. I particularly remember with Knight that I assessed him as being an immature person, despite his relative good performance in training.' I consider this to be a fair assessment of me during the ICT at Majura Range.

During the ICT, I failed the Duntroon Physical Fitness Standard (PFS) test (* The minimum standard for male cadets was 'C' grade, which required the completion of: a 3.2km run in under 13:45 minutes, followed by 7 complete chin-ups to a high bar, 60 sit-ups in 2 minutes, 25 complete push-

ups with the requirement that the chest touch the floor between each push-up and the feet raised onto a 6-inch high bench, and 40 dorsal raises). I passed my PTT but only with a C grade, an indication of my lack of effort and motivation (* NB. I passed my previous PTT only three months previously with a high A grade, and even with a B grade when I underwent Army Reserve recruit training a year previously - see above. After a month of full-time training I should have at least maintained an A grade standard).

After a 3-day field exercise (FEX) in the Mogo State Forest, near Bateman's Bay in southeast NSW - FEX "First Run" - we completed our ICT. Sergeant HOGAN's final Field Report on me noted that I had improved. He rated my performance as 'satisfactory', noted that I displayed 'good aggression', and rated me as '2' in relation to Group Influence.

We returned to the college on 11 February 1987.

For the next three days (11-13 February 1987), we underwent further assimilation, which also involved constant and universal "bastardization" by the senior cadets in our companies. While we were in the barracks we were under the total, unsupervised control of the senior cadets. Throughout the evenings the senior cadets would inspect the uniforms and equipment of the 3rd Class cadets in their section by using constant "Show Parades". **Show Parades** in the barracks were compulsory parades where a junior cadet was required to be at a specific location at a specific time, specified by the senior cadet ordering the Show Parade, to present a uniform and/or article of equipment for individual inspection. An example of a Show Parade order would be the following: "Staff Cadet Knight, Show Parade your parade belt, your parade boots, your parade uniform and your rifle outside my room at 2130hrs." These informal Show Parades could be given to junior cadets by senior cadets in addition to the formal **Extra Drills** (EDs) - which involved extra drill with a rifle on the main parade ground - **Defaulters Parades** - which involved being marched around the main parade ground with full pack, webbing and rifle at 0625hrs and again at 1710hrs - and **Check Parades** - where a defaulter's attendance was checked at the college Battalion HQ. Show Parades were a constant for all junior cadets during the evenings leading up to the Lanyard Parade.

During this assimilation period, all junior cadets were required to observe a number of formalities. Whenever a senior cadet entered a junior cadet's room, the junior cadet was required to stand to attention. Whenever a junior cadet passed a senior cadet in a hallway or on a footpath, the junior cadet was required to come to attention and say, "Excuse me, please" followed by the cadet's rank. The same requirement applied whenever a junior cadet wished to enter a senior cadet's room or to talk to a senior cadet or was called over by a senior cadet. A junior cadet was required to end all conversations with a senior cadet with the same "Excuse me, please" followed by the cadet's rank, and then wait to be dismissed.

On Friday 13 February 1987, the eve of the 3rd Class Lanyard Parade, all the 3rd Class cadets were given a test on the history and organization of the college. Those that passed the test, and only a very few did, were permitted to leave the college on local leave that night. The remainder, of which I was one, were confined to barracks to prepare for the Lanyard Parade. In Kokoda Company's 15 Platoon, Show Parades to senior cadets commenced at around 1900hrs and continued at regular intervals of 10-15 minutes until 2300hrs. At this point most of the 1st and 2nd Class cadets retired for the night and dispensed with ordering further Show Parades. One 2nd Class Cadet in 15 Platoon, Staff Cadet Dale BURNSIDE (CSC No 4775 - a 21-year-old graduate of ADFA who had been at the "old" Duntroon), continued giving me Show Parades until 0200hrs; the last one he conducted from his bed. This was despite RMC Standing Orders proclaiming that 'all cadets are to be left in privacy between 2200hrs and Reveille' (CSC Standing Order 1304h). Reveille was at 0615hrs, although most junior cadets arose between 0530-0600hrs in order to get a head start with their duties and uniform preparation.

It needs to be noted that BURNSIDE was also the subject of at least one other complaint to the DART. I unsuccessfully tried to obtain a copy of this complaint through an FOI request. My appeal against the decision to refuse access was heard by the Administrative Appeals Tribunal (AAT) in 2021 (Case Ref: *Knight v Commonwealth Ombudsman* 2017/5456; 2017/6279. See *Knight v Commonwealth Ombudsman (FOI)* [2021] AATA 2504). The AAT's decision to dismiss my appeal is currently the subject of an appeal to the Federal Court of Australia (Case Ref: *Knight v Commonwealth Ombudsman* VID783 of 2022).

Lanyard Parade

On Saturday 14 February 1987, the entire 3rd Class participated in the so-called Lanyard Parade, which formally recognized our acceptance into the college. Following this parade, the universal “bastardization” of 3rd Class cadets generally tapered off. By the end of the month only certain selected junior cadets were still being “bastardised” on a regular basis. I was one of those select junior cadets. The reason for being targeted were unknown, especially given the fact that the worst offenders often had no experience of the junior cadet they targeted (i.e. they were in different platoons or even different companies). One explanation is that one senior cadet took a dislike to a particular junior cadet – for whatever reason – then “spread the word” to other senior cadets. My main tormenters in Kokoda Company were 1st Class Cadets who were not even in my platoon; they were at Company HQ or in 13 and 14 Platoons, located in the other half of ANZAC Block.

I have attached photocopies of the Kokoda Company group photographs that appeared in the June 1987 edition of the “*Journal of the Royal Military College Duntroon*”, at pages 31-32 (see Attachment 3).

The Military Ethic

The Royal Military College *Handbook* (The Rushkin Press, Melbourne. RMC Publication No 30c, M87/24699 CAT NO 87 3288 7) issued to me and other staff cadets at Duntroon in 1987 stated (at page iv) in relation to ‘The Military Ethic’ that;

Graduation from the Royal Military College (RMC) means graduation into the Profession of Arms. This profession, like others, adopts an ethical standard which guides the professional conduct of its members. As the Profession of Arms exists solely to serve and defend the nation, this profession cannot conduct its affairs honourably without the strongest moral and ethical base. It follows that the standard of conduct and behaviour in the Army, as part of this profession, must be in accord with the highest principles, and must exemplify the ideals and values of the nation.

Cadets, both in their time at the College, and after graduation as officers, must strive to live by the military ethic, which can be illustrated by three words: loyalty, responsibility, commitment. ...

There are two more words which serve as a guide to the actions of officers, and therefore should guide equally the actions of officer cadets. These words are duty and honour. Questions of ethical standards should never arise if officers strive to do their duty in an honourable way. The meanings of these two concepts

are simple. Duty is what ought to be done, bearing in mind the demands of loyalty, responsibility and commitment. Honourable action is that which is morally right when judged by the highest standards of moral behaviour.

Message from the Commandant

The *Handbook* also contained (at page iii) a 'Message from the Commandant'. It read, in part';

The underlying spirit of the College and the standards expected of its Cadets are embodied in the military ethic. This governs all aspects of Cadet behaviour and performance and requires a deep commitment from those aspiring to be professional Army Officers.

The military ethic stresses loyalty, responsibility, duty and honour. The reputation of our graduates has been built on these characteristics both in peace and at war. In a modern society where these values are questioned and sometimes ignored I believe it is essential to preserve a code of conduct which emphasises self-discipline, trustworthiness, and the dignity of the individual.

Major-General BLAKE later told the ABC for its "*Hoddle Street*" documentary that; "I'd certainly make the point very clearly and firmly and empathetically that there's no way I'd tolerate bastardization in the college. I've issued very implicit instructions to that effect and I go to great lengths to make sure that my instructions are carried out" (see Attachment 22).

Daily Routine

The daily routine at Duntroon was the following:

0615	Reveille
0625-0655	1 st Defaulters Parade
0645-0730	Breakfast
0715	Sick Parade (at 5 Camp Hospital)
0730	Form-up for CSC Administrative Parade
0750-0810	CSC Administrative Parade
0820-1040	Lectures/Training
1040-1100	Morning tea
1100-1230	Lectures/Training
1230-1310	Lunch

1310-1320	CSC Mess Parade
1330-1640	Lectures/Training
1700-1800	Retreat (retire to barracks)
1710-1740	2 nd Defaulters Parade
1800-1845	Dinner
1850	1 st Defaulters Check Parade
1930-2130	Evening lectures
2140	2 nd Defaulters Check Parade
2200	Tattoo (retire to quarters)
2230	Lights out

The daily routine began with Reveille at 0615hrs. At Reveille the 3rd Class cadets in 15 Platoon were initially required to stand in their doorways at attention with the bottom sheet of their bed slung over their right shoulder. They were then required to yell in unison "Reveille! Reveille! Reveille!" This requirement was dispensed with after a few days. Junior cadets then mostly arose between 0530-0600hrs in order to get a head start with their duties and uniform preparation. After a few weeks, however, the senior cadets in 15 Platoon invented an order that no 3rd Class cadet was permitted to leave his or her room before 0615hrs, otherwise they would be charged with "disobeying a lawful order". The stated justification for this new order was that junior cadets moving around the barracks were apparently disturbing the "beauty sleep" of the senior cadets.

"Leaps & Jumps"

On one evening shortly after the Lanyard Parade the 3rd Class cadets in Kokoda Company were ordered to report to the hall in the middle of the second storey of barracks. When they arrived they found all the senior cadets assembled and dressed in various costumes and comical dress. One 2nd Class cadet, Staff Cadet Brett FITZPATRICK (CSC No 5170), was wearing shorts with a Luftwaffe jacket and peaked cap. Another senior cadet was dressed in a complete Ninja outfit. Major VERCOE and Sergeant JORGENSON were present as was Kokoda Company's cadet CSM, Under Officer Philip "Mongo" REED (CSC No 4592) (a 21-year-old graduate of the "old" Duntroon and ADFA), who informed the junior cadets that they were going to play "Leaps and Jumps" and that it was all in fun. "Leaps" referred to

an exercise where those participating were required to change into a specific form of military dress and return to the assembly area within a specified time. The person directing the exercise nominated the form of dress and the time required in which to change. For example: "Go back to your room, change into Battledress and be back here in 2 minutes... Go!" The Kokoda Company cadets performed the "Leaps" exercise for around 40 minutes. While the 3rd Class cadets ran to and from their rooms the senior cadets delayed and obstructed them using such tactics as using water pistols, blocking the hallways or stopping cadets to ask them ridiculous questions. Although the exercise was taken in fun by all involved there were a few senior cadets who used "Leaps" as an opportunity to "rough-up the Fourthies" (*a term for junior cadets carried over from when Duntroon was a 4-year course – see Bruce MOORE at page 147*). Selected junior cadets were pushed into walls, tripped, and pushed or thrown heavily to the floor. During one "Leap" Corporal William YATES (CSC No 5148), a tall 20-year-old 1st Class cadet, grabbed me as I ran past and punched me hard twice in the stomach. (*I have boxed in prison and sparred with heavyweight boxers. I know the difference between a playful tap and a serious punch. YATES' punches were delivered with full force*). Major VERCOE and Sergeant JORGENSON remained in the hall during the "Leaps", so they were unable to observe or control these hallway incidents.

1st Charge

On Monday 23 February 1987, I was among seven cadets in Kokoda Company who were charged with Failure to Comply With a Lawful General Order in breach of s.29(1) of the *Defence Force Discipline Act 1982 (Cth)* ("DFDA"). The charge related to having an insecure bayonet. As a Security Store, bayonets were required to be secured in the cadet's room when not in use. The Kokoda Company barracks had been inspected that morning by Sergeant J.J. SMITH, one of the drill instructors, who had discovered that I and six other cadets had insecure bayonets in our rooms. This charge was heard at an OC's hearing held on 5 March 1987. It was my first charge and it disappointed me as I had hoped to maintain an unblemished record at the college. I was also annoyed because, like most of the 3rd Class cadets in the barracks, I had no room key and no keys for my wardrobe locks (*The senior cadets had reserved nearly all the lockable rooms for themselves*). As a result, I had simply hidden my bayonet amongst clothing in a drawer.