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Abstract This article analyses how the Australian Royal Commission into Institutional Responses to Child Sexual Abuse negotiates the figure of the pedophile as monster through the horror genre. It analyses the resonance of the category of pedophiles as monsters or monstrous and the ways in which this impacted upon witnesses' responses to sex offenders, based on assumptions that monsters are outsiders or strangers who are instantly recognizable. I go on to explore the claim that one of the main effects of regarding sex offenders as monsters is that these offenders are construed as having extraordinary powers so that ordinary measures to stop them would be ineffective – accordingly, this reading underplays the significance of institutional responsibility. I conclude that although the Royal Commission consistently undermines and rejects the idea of sex offenders as monsters, a horror reading is still appropriate and insightful. The true “horror” of the Royal Commission is aroused not by the figurative monsters but by the institutions themselves, and their failures.

Keywords, sexual abuse, systemic failure, royal commission, monster, horror

INTRODUCTION

The idea of the pedophile as monster is so common that it is the subject not only of academic analysis but also of self-reflexive media reports criticizing media representations of pedophiles as monsters.¹ This article analyses how the Australian Royal Commission into Institutional Responses to Child Sexual Abuse negotiates the figure of the pedophile as monster. I consider the ways in which the notion of pedophiles as monsters or monstrous inform a number of the witness statements and the ways the Royal Commission navigates those constructions. I will examine how the notion of the monstrous pedophile has intersected with the criminal law in terms of the implications for intervention, enforcement, and responsibility. I use monster theory and the genre with which monsters are most closely related, horror,

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to understand the pedophile. Analysis of the figure through the horror genre, in particular, makes available an interrogation of the construction of pedophiles as monsters and proffers insights into the negotiation of this figure by the Royal Commission.

The Royal Commission into Institutional Responses to Child Sexual Abuse commenced in 2013 and has recently been extended to continue until the end of 2017.² At the time of writing, the Royal Commission has undertaken 56 public hearings, and held more than 6400 private sessions with victim/survivors of child sexual abuse, with more than 2000 people awaiting private sessions. The formal public hearings examine evidence about child sexual abuse and how institutions have (not) responded to allegations of abuse. The public hearings can be accessed by the public and are also telecasted live on the web; the transcripts are available on the website and the findings are then summarized in reports. The Royal Commission has considered child sexual abuse in a wide range of institutions including schools, after-school care, religious organizations, the Australian Defence Force, the entertainment industry, sporting clubs, and healthcare providers. It has generated a huge archive with hundreds of thousands of pages of transcripts, reports, publications, and findings, all of which are available on the Royal Commission website. Whilst the data are readily available on the website, they are not easily searched. Terms cannot be entered to search the whole website – rather, each individual report and transcripts from particular days need to be searched individually. In order to limit the data this article focuses primarily on the final reports of public hearings of selected case studies – which include quotations from witnesses and findings by the Royal Commission. I have supplemented these sources with quotations from transcripts of the public hearings and also media responses to the public hearings. I have read all the final reports and selected particular stories as representative of general themes highlighted throughout the Royal Commission reports. Although the Royal Commission has considered historical examples of institutional failures to respond to abuse, this article focuses particularly on Royal Commission reports of institutional failures in the 21st century. I have chosen these reports to disrupt the comforting notion that institutional failures in response to child sexual abuse arose in the distant past and have since been resolved.

There are various ways in which child sex offenders can be conceived and constructed (e.g., as ordinary offenders or mentally ill), but currently they are frequently labeled and regarded as monsters.³ For example, in his analysis of sex offending, Terry Thomas argued that in an explosion of media interest pedophiles became thoroughly demonized as “monsters” – “evil,” “beasts,” and “fiends.”⁴ Jon Silverman and David Wilson have argued that with the new millennium, pedophiles and terrorists are the “bogey men” of contemporary times.⁵ Monsters are the stuff of fiction, and are particularly associated with the horror genre.⁶ Accordingly, I explore the ways in which the horror genre can provide insight into the ways in which the Royal Commission navigates the figure of the pedophile as a monster,

and the implications of their dealings. This idea of studying the Royal Commission through the prism of horror is part of a larger cultural legal studies project of examining popular culture for how it reflects and expresses assumptions, values and wishes for and about the legal system.⁷ Given the centrality of monsters to the horror genre, I rely upon horror stories to enrich and problematize the labeling of sex offenders as monsters. This is consistent with a classic law and literature approach whereby stories are relied upon to supplement and provide insight into the law.⁸ The Royal Commission itself ostensibly reflects and reinforces a faith in storytelling with an open invitation to survivors and their families to tell their stories of abuse and its impacts – in private and public hearings.⁹ Within the discipline of law and literature, however, there has been a critique of the “romantic” myth that literature is thought to complete law and an excessive faith in narrative.¹⁰ The Royal Commission’s handling of the stories of victims reflects an understanding that stories, in and of themselves, are not enough.¹¹ Whilst there may be underlying assumptions of the cathartic nature of storytelling, the Royal Commission has gone beyond this to categorize and organize the stories into structural themes and issues regarding institutional failure with the aim of identifying areas for reform.

Further, my method is also informed by the recent turn in law and literature to genre as a form of critique of the law.¹² The concept of genre is itself complex and open to debate. Genre has been variously described as a “signal system,”¹³ family resemblance,¹⁴ or pragmatically as the process of where we shelve a book or how we market a film. A key point is that genre raises and imposes assumptions and expectations of what and how a text communicates, and our interpretation in turn is a product of our assumptions about the generic tradition on which the text relies.¹⁵ Adena Rosmarin describes genre as “a kind of schema, a way of discussing a literary text in ways that link it with other texts, and finally, phrase it in terms of those texts [...]”¹⁶ This approach highlights the power of the reader (or critic) to categorize and interpret a text as part of a genre. It has been criticized by some theorists as according too much power to the reader,¹⁷ but it has the advantage of revealing the construction of “specific worlds” with their own “definition of space, time, moral ethos and players”¹⁸ and how worlds, including legal worlds, are created and maintained.¹⁹ Here genre is understood not merely as a stylistic “device” but as constituting ways of being.²⁰

Genre can provide a means for awareness and critique of how the reports of the Royal Commission can be read, and a different mode of interpretation. This kind of critique helps people “begin to have trouble thinking things the way they have been thought”²¹ and experience dissonance.²² This literary approach can make us aware of how we are disciplined to separate sense and sensibility.²³ Royal Commissions are a curious genre in and of themselves. Royal Commissions are frequently used in Australia, Canada, and Great Britain to investigate political wrongdoing and to make recommendations regarding policy and law reform. Although extraordinary modes of inquiry, Royal Commissions are a regular feature of government

administration in Australia and Canada.²⁴ Royal Commissions have all the trappings of law and yet are quasi-judicial. They are informed by law, can include recommendations for prosecutions and law reform, and tend to be populated by judicial officers. The lexicon of a Royal Commission is legal – particularly in terms of hearings and findings – and the hearings reflect the physical architecture of a courtroom and are often held in existing courtrooms. However, the Royal Commission is entitled to ask questions that go beyond those permitted by, or even conceived of as relevant to, the law.²⁵

The current Royal Commission has aroused horror through its unveiling of past and present wrongdoing.²⁶ The question is whether anything is achieved by this recounting of horrors. It has provided a report on the sheer number of inquiries on institutional abuse that have been conducted historically and in recent times, which have ostensibly accomplished little or nothing.²⁷ The non-implementation of recommendations is the most consistent criticism of Royal Commissions.²⁸ I draw upon the horror genre to accomplish a critical reading of the Royal Commission into Institutional Responses to Child Sexual Abuse to uncover that which we take to be self-evident – how and why we read, listen to and/or watch the Royal Commission.²⁹ Constructing the Royal Commission as horror reverses or undoes the Royal Commission genre, making us aware of how specific expectations, interpretations, and literacies underlie and undergird our readings. Royal Commissions tend to be evaluated in terms of function – does a particular Royal Commission serve political ends to avert a crisis or does it present a meaningful opportunity to change policy and practice?³⁰ This article puts the affect of horror at the centre of an analysis of the Royal Commission into Institutional Responses to Child Abuse. I consider whether or not the horror genre may offer hope for reform, whereby the arousal of the affect of horror justifies and requires change. The Royal Commission need not, of course, be read as horror. For example, an alternative approach is suggested by Joseph Slaughter, who reads human rights through the genre of melodrama, arguing that it constructs audiences who understand themselves as bystanders who are “capable of feeling compassion without fear.”³¹

The boundaries of the horror genre are open to dispute. The horror genre takes many different forms, and fans may favor one particular style over another (such as slasher versus zombie), there are however two key attributes associated with the genre. First, the genre is named for the emotional or physiological response it is intended to arouse – horror. The *Oxford English Dictionary* defines horror as “a painful emotion compounded of loathing and fear; a shuddering with terror and repugnance; the feeling excited by something shocking or frightful [...] a thrill of awe, or of imaginative fear.” Whilst there are other breakdowns of the affect(s) the horror genre is expected to generate,³² and different horror stories privilege different affects, for the purposes of this analysis Noel Carroll’s assertion that horror is a mixture of fear and disgust is pertinent.³³ The aim of horror is the arousal of bodily sensation – to label a horror “good” means that it is scary and creepy. Second, the

horror genre is particularly associated with monsters.³⁴ I will consider the attributes of monsters in more detail throughout this paper, but note now that central to the construction of the monstrous in the horror genre is the transgression of the borders of humanity – a disturbance of the “natural order.”³⁵ The fear and fascination of monsters, so central to the arousal of horror, is due to their potential to contaminate and undermine systems of order.³⁶ Not all horror movies have monsters – sometimes it is humans doing particularly evil or monstrous things – and it is open to dispute as to whether as a consequence of these evil actions the villain is a monster.³⁷ Moreover, many horror stories do not necessarily arouse horror. There are many “horror” series on television currently that are populated by monsters that are not really scary, especially for aficionados of horror.³⁸ Despite this, devotees (as well as those utterly horrified by the horror genre) are confident in their own definitions and expectations of the genre.³⁹

Below, I consider, first, the resonance generally of the category of monster and the affect of horror associated with sex offenders. Second, I consider the ways that attributes of monsters impacted upon witnesses’ responses to sex offenders in the Royal Commission, based on assumptions that monsters are outsiders or strangers that are instantly recognizable. I go on to explore the claim that one of the main effects of regarding sex offenders as monsters is that these offenders are construed as having extraordinary powers so that ordinary measures to stop them would be ineffective – accordingly, this reading underplays the significance of institutional responsibility. I conclude that although the Royal Commission consistently undermines and rejects the idea of sex offenders as monsters, a horror reading is still appropriate and insightful. The true “horror” of the Royal Commission is aroused not by the figurative monsters but by the institutions themselves, and their failures.

THE HORROR OF MONSTROUS PEDOPHILES

The premise of this article is to explore the implications of the construction of sex offenders as monsters by witnesses in the Royal Commission. As far as I can ascertain from the searches through some of the hundreds of thousands of pages of transcripts and reports generated by the Royal Commission, witnesses do not explicitly label sex offenders “monsters.” They do, however, invoke the language of monstrosity: they speak of sex offenders as “evil” and/or “predators.” For example, a mother told the Royal Commission that she had told a bishop that her sons thought Ryan was “evil,”⁴⁰ and she had threatened to shoot Ryan or “any other evil priest if they came near my sons or my home.”⁴¹ Offenders were described as “predators”⁴² a “dangerous sexual predator,”⁴³ or as a “horrendous evil,”⁴⁴ or having an “evil character”⁴⁵ and “predatory inclinations.”⁴⁶ Another witness stated she thought “evil rides around the church”⁴⁷ or decried the “abhorrent and evil behaviour”⁴⁸ of the offender.⁴⁹ These descriptions of sex offenders as evil predators is consistent with monsters – human/beasts transgressing the lines between good and evil, human

and animal. In horror, monsters are portrayed as evil malevolent beings who wish only to do us harm (think pretty much any monster). Despite the absence of explicit labeling of pedophiles as monsters by witnesses in the Royal Commission, the media reporting of the Royal Commission has sustained a portrayal of pedophiles as monsters, with headlines such as “Friendly priest became paedophile ‘monster,’”⁵⁰ “Evil, depraved monster paedophile,”⁵¹ and “Gerald Ridsdale: portrait of a monster as a forgetful old man.”⁵²

The construction of pedophiles as monsters or monstrous has been linked to an accompanying shift in how sex offending was portrayed in popular discourse from the 1990s onwards, when popular discourse shifted from child sexual abuse to increasingly focus on the figure of the pedophile, who was constructed as a highly dangerous stranger who attacks, sexually abuses, and possibly kills children.⁵³ The media frequently portrays sex offenders in a way that is sensationalistic and demonizes offenders.⁵⁴ The language used is frequently consistent with the construction of sex offenders as monsters. Epithets used to describe pedophiles in the media include evil, fiend, predator, demons, perverts, and monsters.⁵⁵ Like monsters, pedophiles are constructed as a threat. They are deviant, abnormal, predatory, and perverted. The media focuses on a small number of convicted offenders.⁵⁶ They are presented as a distinct and dangerous category, as a separate species, sub-human, or a “breed apart.”⁵⁷ Like monsters, pedophiles are conceptualized as outside society with people refusing to accept sex offenders who have served jail time back into their community.⁵⁸

Labeling pedophiles as monsters resonates in part due to the transgression of boundaries. Monsters are represented in horror and conceptualized in philosophy as beyond understanding, as incomprehensible to human beings. For example, Michel Foucault explicitly considered the production of monsters in *Abnormal*:

Essentially, the monster is the casuistry that is necessarily introduced into law by the confusion of nature [...] it is a monster only because it is also a legal labyrinth, a violation of and an obstacle to the law, both transgression and undecidability at the level of the law.⁵⁹

For Foucault, the production of monsters should be understood as a double breach of nature and law, they “combine the impossible and the forbidden.”⁶⁰ Monsters generate fear and fascination because they not only break rules and cross borders, but also challenge the border itself, by being both and neither one thing and another.⁶¹ Monsters resist and refuse easy categorization. They are disturbing hybrids that refuse to participate in the classificatory “order of things,” problematizing and challenging classifications built on hierarchy or binary oppositions.⁶² They embody and unleash the chaos that exists on the other side of cultural boundaries. Monsters break apart the “either/or” syllogistic logic with a kind of reasoning closer

to “and/or.” For example, vampires are the living dead – they are neither/both dead and alive.

The specific border changes from story to story, but the function of the monster remains the same: “to bring about an encounter between the symbolic order and that which threatens its stability.”⁶³ In some stories, the monstrous is produced at the border between life and death (vampire and zombie stories), the normal and the supernatural (*The Exorcist* [1973], *The Omen* [1976], *The Nightmare on Elm Street* series, *Stranger Things* [2016]), between human and beast (*Dr Jekyll and Mr Hyde*). Pedophiles are regarded as having transgressed a boundary erected by law and society between adults and children. Adults having sex with children is against the law and arguably against nature (in accordance with Foucault’s definition of the monster). By breaching this rule, sex offenders have crossed the border of humanity – having this “evil” and “perverted” desire and acting upon it is regarded as unimaginable and outside the realms of humanity. Moreover, the transgressions of child sex offenders undermine the accepted roles and boundaries between adults and children. Not only do pedophiles actively harm children, but also they interrogate the role of those adults who failed to protect children from sex offenders.

According to Foucault, each age had its “privileged monster” – the bestial human in the Middle Ages, Siamese or conjoined twins in the Renaissance, and the hermaphrodite in the Classical Age.⁶⁴ Monsters are historically conditioned rather than psychological universals,⁶⁵ and much of contemporary horror revolves around a concern for and breach of sexual boundaries.⁶⁶ “The release of sexuality in the horror film is always presented as perverted, monstrous and excessive, both the perversion and the excess being the logical outcome of repressing.”⁶⁷ Arguably, pedophiles are “privileged monsters” due to the breaching of sexual boundaries. However, although children feature in horror, they are rarely explicitly portrayed as victims of sexual abuse. Child sex offenders are almost never portrayed in horror stories, possibly due to the taboo of such a lowbrow genre representing such a serious and taboo subject,⁶⁸ and/or perhaps due to a contemporary perception of sex offenders as real-life monsters who disrupt the comforting contract with audiences of horror fiction that the monsters, whilst scary, are not real.

Only some individuals or groups are at any historical moment demonized by the term “monster.” Heroes, like Superman, Spiderman, and Doctor Who are also unnatural and inexplicable, yet they are not labeled monsters.⁶⁹ Accordingly, there is more to a monster than the transgression of laws and classificatory systems. In defining the horror genre, one of the most important characteristics are the modes of affect that horror films intend to arouse in audiences, the arousal of fear and disgust. Sex offenders return us to archetypal fears of childhood of the bogeyman and of adults who are not what they seem.⁷⁰ The word “monstrous” is used to imply very large size – and the image of the sex offender plays on fears of a large threat looming over a child. Sex offenders encapsulate the adult anxiety of a child going missing, that heart stopping moment of taking one’s gaze away for a moment and losing a

child. Sex offenders also arouse disgust. Disgust is not just a reactionary conservatism,⁷¹ but the emotional expression of a moral intolerance of practices antithetical to the individual and the community.⁷² In his masterful analysis, William Miller argues that disgust is a moral and social sentiment that conveys a “strong sense of aversion to something perceived as dangerous because of its powers to contaminate, infect, or pollute by proximity, contact, or ingestion.”⁷³ Miller describes disgust as an emotion that initially expresses the protection of the body but develops into the protection of the soul. For example, humans first express disgust in response to hair in the mouth, but the lexicon of disgust develops to express moral opprobrium. The language of disgust can be used to express the horror of eating food that we discover too late contains a cockroach and then transferred to express repugnance of sex offenders and sex offending. Carroll has argued that monsters are something that humans do not want to have contact with – we recoil from them and feel nauseated by them, even when the threat of harm has been removed. They “make one’s skin creep.”⁷⁴

Monsters arouse the affect of horror because of their capacity and willingness to inflict harm. Through their actions they maim, destroy, contaminate, and spoil that which is good. For example, vampires suck the life out of their victims. Once infected, victims of vampires and zombies lose all interest in that for which they previously cared. They are taken away from themselves. “Disgust never allows us to escape clean. It underpins the sense of despair that impurity and evil are contagious and endure, and take everything down with them.”⁷⁵

Sex offenders can inflict serious physical, mental, and social harms to victims. Every report of the Royal Commission devotes some time to enunciating the harm done to the victims (and their families) by the sex offender. These harms include physical and psychological problems, including depression and anxiety. It can affect relationships with family members, friends, and partners. The trauma can impact on employment history and prospects. For example, in the case study on the response of the Australian Christian Churches to allegations of sexual abuse, the report records that the district court judge sentencing the sex offender noted that his impact on the victim was “catastrophic.”⁷⁶ The victim spoke of the effect of the offender on his life in terms consistent with the lexicon of horror: “The pain, thoughts and considerable suffering haunts me every day. People say it gets easier with time: no. That’s a lie, it never goes away and doesn’t get easier with time.”⁷⁷

Extreme disgust can fill us with a sense of being haunted. It is contaminating and infectious – that which is disgusting has almost magical powers of invasiveness and duration.⁷⁸ The language used by witnesses in the Royal Commission is consistent with the lexicon of disgust, e.g., sex abusers are “too revolting” for committing “such hideous crimes.”⁷⁹ In apologizing for his and the school’s failure to respond, one former principal stated:

This Royal Commission has revealed the horrific extent of Trutmann's sordid and predatory sexual abuse of at least 40 young students in the Geelong Grammar School Highton Boarding House and elsewhere between 1985 and 1996. It has been a disturbing and sickening revelation to me.⁸⁰

The word "horrific" is an offshoot of horror. The physical, visceral response of "sickening" is consistent with disgust. A victim of abuse asserted that, as a result of the abuse, "the past ten years of my life have been a living hell."⁸¹ In the Royal Commission reports, the harm inflicted intentionally by sex offenders is described in terms reminiscent of horror. While not being explicitly labeled monsters in the Royal Commission, the great emphasis upon the harms inflicted are consistent with the idea of sex offenders as monsters, as evil predators who arouse horror due to the intentional infliction of lasting harm. However, as I argue below, the wider scope of the Royal Commission's investigations, and its particular concern with the role of institutions in facilitating abuse, significantly contributes to the characterization of institutions themselves as monstrous.

STRANGERS AND OUTSIDERS

In contrast to the approach of the Royal Commission itself, the conceptualization of sex offenders as monsters by witnesses in the Royal Commission is more explicit (and dangerous). A key attribute of monsters is that they are outsiders. This is in part because their infliction of harm upon others locates them beyond the borders of humanity, but also because of an assumption that monsters are strangers – they come from somewhere else, they are not like you and me. In many horror stories, a monstrous stranger or outsider threatens the family.⁸² Strangers have tormented the family in fictions such as *Poltergeist*, *American Horror Series 1*, *It*, *The Shining*, *The Exorcist*, and the *A Nightmare on Elm Street* series.⁸³ The genre represents a threat from outside disrupting the safety of the family (and frequently the family home).⁸⁴

This construction of the pedophile as monster is misleading because it directs the focus to stranger danger. The media tends to focus on a few high-profile cases of abuse – and these are almost always cases involving strangers.⁸⁵ This augments a belief that the primary threat comes from outside the family or familiar structures, and that the threat emanates from a stranger. In the Royal Commission, this idea of stranger danger presents and is disrupted in different ways. In Case Study No. 18, for example, the offender, Baldwin, married into the family of Doctor Lehmann, the senior pastor of the Sunshine Church. As a consequence of this familial relationship, Doctor Lehmann failed to respond adequately to complaints about Youth Pastor Baldwin's inappropriate behavior with the victim, ALA. In addition to complaints and reports by other staff, including senior leaders of the church, Doctor

Lehmann was personally aware of some of Baldwin's inappropriate behavior including that Baldwin had an "intense" relationship with ALA, Baldwin frequently segregated ALA from others, wanted to give a large number of awards to ALA, had proposed purchasing ALA an expensive present, and had been alone with ALA in his car.⁸⁶ Doctor Lehmann asserted that despite these warnings, he failed to protect ALA from Baldwin because Baldwin was his son-in-law. "When I sit down and have a meal with him, share a bottle of red wine with him, I don't think I'm doing this with a pedophile."⁸⁷ Despite Baldwin being convicted of ten charges, at the time of the Royal Commission Doctor Lehmann still did not accept that Baldwin was a pedophile, stating:

I'm not saying he didn't make errors of judgment, but I have two grandsons by him, a third one about to be born; if I believe he is a paedophile, then I've got to face the reality that our three grandsons are at great risk.⁸⁸

For Doctor Lehmann, any threat to his family is still conceived of as coming from outside the family, by a stranger, rather than from a member of his family, and the father of his grand-children.

This failure to recognize sex offenders on the assumption that they will be a stranger or outsider is a recurring theme in the Royal Commission. It was expressed thus by a victim:

The school instructed students on "stranger danger," but there was no emphasis on "friendly danger" or grooming behaviors. WP, a survivor of child sexual abuse at the school, said in evidence that if there had been, it would have been easier for him to report his sexual abuse.⁸⁹

The Royal Commission highlights that the emphasis on stranger danger results in a misrecognition of threats. The stranger is someone who is unknown – and who comes from the outside. But in all the Royal Commission case studies, the offender is someone who is in a position of trust and is known to the victim and the family. It is inherent in the terms of reference of the Royal Commission that the focus is on offenders operating within institutions rather than as outsiders. In fact, the offender may have been assiduous in cultivating the trust of the victim, their family, and the institution.

A key plot device in the genre of horror is the origin of the monster.⁹⁰ This reflects a question of philosophy and theology – from whence does evil come?⁹¹ One way of resolving a monster's origins is by constructing an alternative world or dimension. In *Alien*, the monster is from another planet. In *Buffy the Vampire Slayer*, the presence of ghouls is explained by the town resting on a hell mouth. In

The Exorcist, the possessing demon is from hell. In *Stranger Things* (2016) the monster comes from another dimension – the “upside down.” Even where monsters have been created in this world, they are outsiders and strangers due to their transgression of borders. Frankenstein’s monster is created by comingling corpses and crossing the border between life and death.

Although the genre of horror celebrates and performs stranger danger, it also portrays a more insidious monster – that which comes from within the family and/or the community. In films such as *Scream*, *Halloween*, and *Friday the 13th* the monster starts as a human in the family and/or community. In novels and films such as *The Shining* and *Insidious*, a beloved family member is (possessed by) the monster. Accordingly, the Royal Commission is consistent with much of the horror genre which plays with or disrupts the expectation that monsters are outsiders or strangers – victims are too focused on outside threats or too close to someone to perceive the inside threat. Horror and the Royal Commission remind us that this complacent focus on outsiders is misplaced and dangerous.

THE RECOGNIZABILITY OF MONSTERS

The assumption that monsters are outsiders informs a related belief – that monsters are recognizable. They are not like you and me, and their monstrosity is visible. In the Royal Commission, some witnesses did not report inappropriate behavior because they assumed that pedophiles are easily recognizable. For example, in Case Study No. 2, Jonathan Lord abused children at and throughout his employment as a casual childcare assistant at YMCA between 2009 and 2011. He was convicted of 13 offences involving 12 children in 2013. One of his colleagues gave evidence that her understanding of the demographics of a typical offender was likely to be from media and television:

“It would be somebody older, unmarried, and took that sort of sexual orientation through the means of desperation rather than choice.” Similarly, [another colleague] stated that she did not put Lord “in the category of child molesters” as she had a mental “picture of a child molester,” which was nothing like Lord.⁹²

The image that staff had of pedophiles meant that they did not recognize Lord as a pedophile, because he looked no different from you and me.⁹³ Indeed, this was one of the reasons they gave for not reporting him, even though some of his behavior was “odd.”

The assumption that sex offenders are recognizable monsters is reflected and reinforced in media reporting of certain pedophiles who have captured the popular imagination, to the extent that these offenders have been labeled “iconic monsters.”⁹⁴ The photos of pedophiles under arrest, trying to evade an angry public or

their mug shots confirm a stereotypical image of a pedophile – with wild grey hair, frenzied eyes, inappropriate clothing choices. We assume that we know one when we see one. For example, most people in the state of New South Wales, Australia, would be able to recognize serial sex offender Dennis Ferguson. Upon revelations of his sex-offending history, the British entertainer Jimmy Savile's appearance fit so well into the stereotype of a sex offender that it was almost as though he was hiding in plain sight: Savile usually wore a tracksuit, gold jewelry, and had long white hair.

This assumption of recognizability is informed by the belief that the body of the monster itself displays the transgression of boundaries. Many iconic monsters are instantly recognizable as monsters – think zombies, Frankenstein's monster, the Blob, some vampires,⁹⁵ and Mr. Hyde.⁹⁶ Monsters may be instantly recognizable by some external insignia – think the facial scars and the knives for fingers of Freddie Krueger. Or they become recognizable by their behavior – zombies walk strangely and cannot talk. It is comforting to believe that monsters are recognizable at first sight, even though the sight of them may in and of itself be horrific.⁹⁷ This is based on the idea that wicked deeds or character are manifested in external traits.⁹⁸

The horror genre also complicates and disrupts assumptions about the recognizability of monsters. Many monsters lack external markings and any indications that they are monstrous – including those in *The Omen*, *Invasion of the Body Snatchers*, and most vampires.⁹⁹ These stories play on an insidious fear that anyone could be a monster and we would have no idea until the point of no return. Their chameleonic nature is part of their horror.¹⁰⁰ These films express and excite a paralyzing paranoia, the monster/alien could be everyone and no one. Thus, in the glorious *It Follows*, the monster is a shape-shifter that is knowable because only the victim can see it. The *Scream* films, and the recent highly enjoyable Netflix television adaptation, have a monster that is recognizable due to his/her mask – but when unmasked – is a part of the community. In all these movies, the monster is only recognized at the point of no return. This reflects a paradox in popular discourse about pedophiles – on the one hand, pedophiles are easy to spot, but on the other, they are able to merge and manipulate.¹⁰¹ Pedophiles are constructed like gothic monsters with a dual identity – with a facade of normality covering evil and cunning – like Doctor Jekyll and Mr. Hyde, and Dorian Grey and his portrait. In many horror stories, the monster is easily recognizable to the audience as a monster, but not to victims until too late. This is particularly the case for vampires who are strangers who gain acceptance into a community but have insignia such as white skin, pointy teeth, and often a foreign accent that indicate they are dangerous.¹⁰² The idea of appearances belying reality is disturbing and discombobulating:

Abjection [...] is immoral, sinister, scheming, and shady: a terror that dissembles, a hatred that smiles, a passion that uses the body

for barter instead of inflaming it, a debtor who sells you up, a friend who stabs you [...].¹⁰³

The pretence of civilized behavior and friendliness in order to access children disturbs and undermines system and order. “I certainly have been absolutely horrified by the predatory actions, the depravity, and the power play by these pedophile priests over people who should have expected just the opposite: care and love and support.”¹⁰⁴

Horror is aroused because of the disjunction between the duties and expectations of a person and their nefarious motives. The person who seems most helpful, most interested, and most caring is the person who intends the most harm. Their charms are used for nefarious purposes – like the sex offender Lord offering free babysitting, or the “friendly priest.”¹⁰⁵ The horror genre problematizes the assumed recognizability of monsters – the worst monsters are hidden or not recognized until too late. Monsters are the perfect figures for negative identity, they produce the negative of human – so it is difficult to articulate exactly what a pedophile looks like. The horror genre encourages us to reflect that there are no specific traits associated with pedophiles and undermines the assumption that they are recognizably wrong or “off.”

THE MAGICAL POWERS OF MONSTERS

The Royal Commission demonstrates that the conceptualization of sex offenders as monsters who are recognizable by some witnesses resulted in these witnesses failing to report and respond to the abuse at any level. Of more significance is the belief that sex offenders have extraordinary powers so that ordinary measures to defeat them are doomed. This reflects a key attribute of monsters in the horror genre – that of extraordinary powers.

The idea of special powers ascribed to pedophiles was asserted by some witnesses in the Royal Commission. This was primarily ascribed to pedophiles’ monomania – the desire for access to and sex with children. Managers of institutions asserted the special powers of pedophiles to explicate their failure to protect children. In other words, they did not stop the sex offender(s) because they could not. For example, the YMCA, one of the largest providers of after-school care in New South Wales, issued a media release during the public hearing in 2013 referring to “Lord’s ‘secretive and sophisticated activities that allowed him to gain access to children,’ ‘the insidious, secretive, devious and sophisticated conduct of paedophiles who seek access to children through child care organisations.’” The YMCA depicted Lord as a “mysterious paedophile who had infiltrated their organisation.”¹⁰⁶ He was especially cunning, mysterious, and malevolent, thus there was no reasonable way that YMCA could have prevented him from offending.¹⁰⁷ This parallels media

representations of pedophiles as sly, manipulative, and deceitful, systematically infiltrating certain professions in order to access children.¹⁰⁸

The belief that pedophiles have extraordinary powers is consistent with the construction of monsters. Some monsters might have powers that no human has – like immortality, extrasensory hearing or smell. Harms inflicted by Freddie Krueger in his victim’s dreams are carried through into real life. Some monsters might have desires that no human has – including eating brains or drinking blood – or just a malevolent desire to maim and destroy.¹⁰⁹ In the current *Scream* series on Netflix, the killer hides behind a mask, but seems to have superhuman strength, speed, and cunning. Part of a monster’s strength is frequently monomania – they want only one thing. Thus, zombies are usually not particularly speedy or smart – but they only want to eat brains – they do not get distracted or tired and are inexorable.¹¹⁰ A central tenet of the horror genre is that ordinary measures against monsters will not succeed. Monsters stalk, threaten, and wreak havoc until the bitter end of horror stories and often beyond (allowing for sequels). After all, if monsters were defeated at the beginning there would be no horror story. They are only defeated (if at all) at the end with extreme measures – which then in and of itself has the potential to undermine the humanity of the hero/ine.¹¹¹ Vampires and zombies cannot just be killed. The rules vary slightly across stories, but something extraordinary is required to resolve monsters – vampires need a stake through the heart and the brains of zombies must be destroyed.

An ordinary response to threats or harm would be to turn to people in authority, but in the genre of horror authorities are often portrayed as ineffective or themselves evil/corrupted. In the Royal Commission, people feared reporting suspected sex offenders because they thought that they would not be believed. For example, teachers at an independent school stated that they felt “trepidation” in raising concerns about suspicious behavior in part because they feared that they would be subjected to rejection, ostracism, or bullying if they reported the suspicious behavior.¹¹² This is consistent with plots in horror stories where whistleblowers are themselves treated as the problem. Unfortunately, the Royal Commission reports all too frequently confirm these apprehensions of disbelief and the failure to respond by those in authority. One teacher at a Perth school overcame her fears that she would look “stupid” if she reported inappropriate behavior, however after nothing came of her first report she did not report any further inappropriate behavior.¹¹³ The Royal Commission has also analyzed police responses to reports of sex offending which at times (but not always) confirmed the critical portrayal of the authorities in horror fiction. For example, Report No. 9 provides a history of failures by the police to investigate, prosecutors to prosecute, and the authorities failure not only to act to prevent sexual abuse but also to glorify and celebrate the offender by inducting him into the swimming Hall of Fame despite multiple allegations of abuse.¹¹⁴ In the genre of horror, police, teachers, and parents usually have no idea of what is going on, if they are told they do not believe it, and their actions are

frequently worse than useless.¹¹⁵ Police and security guards are particularly inept. They often suspect and lock up victims and/or treat the person who reports the monster as mad.¹¹⁶ Police and security guards either end up dead or are revealed as monsters themselves. Horror fiction often portrays the fear that there is no one to whom a monster and its wrongdoing can be reported, and even if there were, that that person would not do anything useful. Both the Royal Commission and the genre of horror explore the intensified fear of feeling that there is no one to turn to and that authorities cannot or will not help.

In the Royal Commission, some members of management used the argument of the extraordinary powers of monsters and the consequent impossibility of defeating and protecting against pedophiles to explain and defend institutional failures. According to this argument, there were no basic steps that could have been taken against sex offenders. How, the management of YMCA argued, could they have protected the institution against the cunning lies of Lord?:

Jonathan Lord offered two referees and obtained a Working with Children Check. He presented himself as a respectable member of his community. He made a general reference to having been involved with a children's camp in the United States and, as is now apparent, he lied about the circumstances in which he returned to Australia [...].¹¹⁷

Although the Royal Commission presented the assertions of the extraordinary powers of sex offenders in the final reports, it undermined and disputed these excuses. The Royal Commission has consistently sought to reject the notion of pedophiles as monsters and to emphasize that ordinary measures and procedures could and would have prevented sex offending. Thus, a common institutional failure in the Royal Commission reports was not following internal procedures for recruitment, any of which would have resulted in the offender not having been employed in the first place.¹¹⁸ For example, if the person in charge of recruitment, Barnat, had followed even one of the YMCA recruitment policies, Lord would not have been employed. Lord submitted a one-page document containing personal details and work experience. Barnat did not spot any "red flags," but if she had been adequately trained (in line with YMCA policies) she would have easily spotted issues in his short application: "Lord said one of his career ambitions was 'to work with kids and help them to experience life, love and friendships in an environment where there are no walls or boundaries.'"¹¹⁹ This sentence in an otherwise short document should have raised questions about whether Lord understood the importance of boundaries for children and his responsibilities in maintaining boundaries.¹²⁰ Barnat also failed to follow up on Lord's statement that he had worked in America as a Cabin Counselor but had to leave early. If Barnat had followed YMCA procedure and checked Lord's claims with his most recent employer she would find out that he had been the

subject of an employer investigation because of suspected inappropriate behavior at Camp America.¹²¹ Barnat also did not follow up with his references, one of whom was a family member. The Royal Commission responded bluntly, dispersing any especial cunning by Lord and consequent disavowal of responsibility by YMCA:

We do not accept that Lord infiltrated YMCA NSW. Rather, YMCA NSW let him in. Lord applied for a job and because of significant failures in recruitment, screening, management, supervision, and training, his employment continued and his conduct was not reported and he sexually abused YMCA children.¹²²

The Royal Commission reports also indicate other failures according to basic child protection procedures including unsupervised contact with children in contravention of procedures,¹²³ failure to follow up on suspicious behavior or even just basic failure by an employee to fulfill the terms of their employment.¹²⁴

In his analysis of monstrous wickedness, one of Phillip Cole's key arguments is that monsters serve a narrative function.¹²⁵ Monsters are figures in a story in which they are given a specific and prescribed role. For Cole, the function of labeling and constructing terrorists as monsters is to create a community of fear, and to justify and require extreme responses. In the Royal Commission, a key narrative function for witnesses of constructing pedophiles as monsters is to disavow responsibility, particularly institutional responsibility. For example, in the YMCA, labeling Lord a monster was a way for management to disavow responsibility – there were no reasonable steps or procedures that they could have taken to prevent the evil and cunning Lord. He was a malevolent monster who had infiltrated their organization and there was nothing that they could do to protect against him. “By assigning blame to individual junior staff members and the conduct of an ‘insidious, secretive, devious and sophisticated [...] paedophile,’ YMCA NSW failed to acknowledge its own significant failings.”¹²⁶

A mythological conception of evil individualizes a serious social problem, focusing on individual pathologies and failures, rather than the social and structural context that enabled offences against children.¹²⁷ The Royal Commission rejected this individualistic mythological conception and instead of focusing on individual sex offenders it has analyzed the institutional failures that allowed, condoned or facilitated the offending behaviors.

REJECTING THE NOTION OF PEDOPHILES AS MONSTERS AND THE HORROR OF INSTITUTIONAL FAILURE

Whilst witnesses as individuals and as representatives of organizations may have conceptualized sex offenders as monsters – transgressive, malevolent outsiders with extraordinary powers – the Royal Commission has consistently attempted to

demonsterize pedophiles and to situate sex offending behaviors and motives as predictable and comprehensible, rather than supernatural and mysterious. Accordingly, the Royal Commission has arguably sought to resist a horror reading. Despite this, there are still consistencies with the horror genre. Robin Wood has argued that the “true subject of the horror genre is the struggle for recognition of all that our civilization represses or oppresses; its re-emergence is dramatized, as in our nightmares.”¹²⁸ In horror, the repressed familiar returns, unfamiliar and monstrous. The Royal Commission is an exercise in uncovering and bringing to the surface nightmares that institutions have sought to repress or oppress. In the Royal Commission, familiar, safe, and cherished institutions have been rendered strange and dangerous. Linda Williams has argued that “contemporary horror has specialized in making the inside visible, opening it up and bringing it out and pushing the spectacle of interiority to the limit to find out what that limit is.”¹²⁹ Just as in horror, the Royal Commission has opened up the inside of institutions that are normally closed to us. The innards of the institutions have been exposed – hierarchical structures, decision-making, policies, and procedures.

Horror plays on the conflicting desires to both see and look away. Many people will never watch horror, but amongst those who do, some will cover their eyes at the climactic infliction of violence to avoid seeing what they know will happen. This trait of (some) audience members is so well known that directors play with it. Thus, in *The Omen* (1976), the director David Walker intentionally extended the depiction of a decapitation, viewed through several different cameras, so that feeble audience members who looked away would look up and be forced to see the head being lopped off from a different angle.¹³⁰ Horror films manipulate point of view – running and breathing with a victim, shifting to a monster’s viewpoint, then to a third person’s, and then documentary observation. The dependence by the Royal Commission upon witness statements, from varying sources including victims, victim’s families, staff, management, experts, and even sex offenders, similarly provides shifting viewpoints. Likewise, in the Royal Commission a constant theme has been the exploration of a tendency to look away, to avoid looking at and confronting child sexual abuse. It has provided the same story, over and over again, from a variety of different viewpoints to force people to hear and see.

Both horror and the Royal Commission offer sustained meditations on wickedness – what a wrong is, who is responsible, and who deserves to be punished. In the pursuit of this meditation, both horror and the Royal Commission extend beyond the concerns and evidence that would be the focus of the criminal justice system. In the hearings, the Royal Commission accepts that a witness did not have a legal duty to report suspicion of abuse, and yet witnesses are often questioned about their failure to report. These witnesses are asked about their emotional reaction and whether even in the absence of a legal duty they should have acted. This provides a richer account of culpability that goes beyond existing legal duties.

In common with the genre of horror, the Royal Commission arouses the affect of horror. Yet the fear and disgust is not primarily aroused by the sex offenders, but by the institutional and systemic failures to adequately prevent and respond to sex offending. The very title of the Royal Commission indicates its focus – upon institutional failures. The reports provide a deadening, depressing, distressing repetition of the same kinds of failures, over and over again. Both the genre of horror and the Royal Commission have almost a compulsive repetitiveness. Horror stories and the Royal Commission represent wrongdoing with subtle but repetitive variations on themes. A frequent theme of horror is the way in which institutions are somehow complicit with monsters. In horror, corporations may have created the monster or have protected the monster for good or nefarious purposes.¹³¹ In the Royal Commission, representatives of institutions may have chosen to protect the institution over and above the children they had a duty to protect, a form of institutional narcissism. Or the institution may have failed to train staff adequately to recognize grooming behaviors, have systems in place to prevent or minimize opportunities for grooming and offending, or have inadequate systems for reporting. The levels of culpability by institutions and their representatives vary greatly, from simple ignorance to active facilitation. The infliction of harm facilitated by institutional failure and the repetition over and over again of different forms of failure arouse horror.

This then harks back to another common theme of the horror genre – that the monsters are visible and real, yet are only part of the problem.¹³² The Royal Commission marks a shift away from a mythological wickedness to something more banal, insidious and depressing. It provides a template of a contemporary technology of wrong doing – a bureaucratic, collectivized failure. Part of the horror is that we do not know how to conceptualize and respond adequately to this kind of collective failure. The dominant model of culpability in criminal law and society of individualized, subjective wrongdoing has diverted us away from developing a lexicon and legal account of collective culpability.¹³³ The Royal Commission demonstrates the absence of, and need for, an account of collective responsibility – as we become increasingly dependent and interdependent on each other and complex organizations. It has highlighted an asymmetry of harm inflicted and responsibility for it: “the greater the suffering, the less responsibility can be established for it.”¹³⁴ The Royal Commission has refused to reduce responsibility and culpability solely to individuals, and yet it has highlighted the absence of models of collective responsibility to apply to articulate, regulate, and ascribe culpability in these examples of institutional failings. Hannah Arendt concluded her analysis of the trial of Adolf Eichmann by stating she had come to the dreadful realization that Eichmann was “terribly and terrifyingly normal.”¹³⁵ The Royal Commission has highlighted that these proliferations of harms due to institutional failures are terrifyingly normal.

Many horror stories wallow in visions of disorder before order is reinstated. This reimposition of order is not always final or satisfying. Horror films represent social upheaval and chaos. They provide an exploration of what happens when the

broader structures of society fail – including family, gender, life and death, and the state. Apocalyptic horror films explore the literal end that results from social decay and chaos. Similarly, the Royal Commission is an exercise in the failure of broader structures and generates a hope that some kind of order will be reinstated. The genre of horror is not immoral. It often represents a morality (albeit warped) and excites at least a desire for justice (which may or may not be delivered).¹³⁶ Likewise, the Royal Commission excites a desire for justice, which may or may not be delivered.

The horror genre has a “negative aesthetic aim”¹³⁷ – it is designed to disturb, and arouse fear and disgust. The Royal Commission has aroused some fear, but particularly disgust, in enunciating and detailing the harms to victims enabled by institutional failures. But what are we to do with these negative emotions? The horror genre is fictional. We know that the monsters will not leave the screen. The genre can be conservative in the reimposition and statement of order (e.g., in the policing of sexual boundaries), but it can also be radical in its critique and challenge of existing boundaries.¹³⁸ Theorists have recognized the “promise” of monsters in their capacity to challenge and disrupt categories and boundaries. Monster theory celebrates and fears monsters as agents of change – representing and enacting both threat and promise. Monsters are a challenge to existing taxonomies, understandings and categories, particularly those premised on binary thinking. Binaries are products of essentializing generic categories. Those who breach and transgress boundaries can be regarded and constructed as monsters, contaminated and contaminating, and blamed for their transgression. Monsters represent difference and multiplicity rather than sameness. A common theme of monster theory is to emphasize the promise of monsters. For example, Jack Halberstam reads monstrosity as “almost a queer category”:

The monster always represents the disruption of categories, the destruction of boundaries, and the presence of impurities and so we need monsters and we need to recognize and celebrate our own monstrosities.¹³⁹

Monster theory has been applied to disrupt distinctions such as those between human and animal¹⁴⁰ and the categories of male and female.¹⁴¹ On these accounts, admixtures of genres and borders – offer political promise or a “reverse discourse.”¹⁴²

The Royal Commission could be read as a disruptive monster. Like other Royal Commissions and inquiries in the past, this Royal Commission could have conservative or radical effects.¹⁴³ In sheer size alone, the Royal Commission is monstrous. Originally intended to proceed for two years, it has since been extended and will continue until the end of 2017. It has generated a mountain of transcripts, findings, reports, papers, and recommendations. As a behemoth the Royal Commission is disruptive of the established order. Not only has it threatened and harmed established,

cherished institutions that failed to protect children, but also it is challenging established models of responsibility. It is disrupting the contemporary focus on subjective, individualized wrongdoing and considering instead collective responsibility and the culpability of institutions. In particular, it has aroused disgust for sustained institutional failures. Whilst some theorists have argued that disgust should never be taken into account in the legal system,¹⁴⁴ disgust has the advantage of requiring and justifying a response. We can respond to the disorderly by changing the systems of order.

The horror genre is an imaginative expression and performance of fears. Imagination is required to construct the monster – but also to defeat it. Although the Royal Commission has resoundingly rejected the idea of pedophiles as monsters there remain consistencies with horror. Much of horror is concerned with “a search for that discourse, that specialized form of knowledge which will enable the human characters to comprehend and so control that which simultaneously embodies and causes its ‘trouble.’”¹⁴⁵ The Royal Commission has a similar trajectory. It is focused upon the articulation and exploration of the powers and weaknesses of institutions and the “troubles” caused by systemic failures and highlights that we will need imagination to solve the problems and go beyond existing structures.

DISCLOSURE STATEMENT

No potential conflict of interest was reported by the author.

1. Mark Dombeck, “Monstrous but Not Monsters,” *mentalhealthnet*, October 1, 2002, <https://www.mentalhelp.net/articles/pedophile-priests-monstrous-but-not-monsters/>; Todd Nickerson, “I’m a Pedophile You’re the Monsters: My Week Inside the Vile Right Wing Hate Machine,” *Salon* (September 30, 2015), http://www.salon.com/2015/09/30/im_a_pedophile_youre_the_monsters_my_week_inside_the_vile_right_wing_hate_machine/. Recent examples applying the monster label to pedophiles in the press include: Lewis Dean, “Britain’s Worst Paedophile Richard Huckle: How Monster Preyed on Malaysian Children and Wanted Bitcoin for Child Porn,” *International Business Times*, June 6, 2016; Robin Schiller, “‘Cookie Monster’ Paedophile Dies While on Temporary Release,” *News Courts*, June 7, 2016.
2. For further information, see the Royal Commission website: <https://www.childabuseroyalcommission.gov.au/>. Henceforth, I will refer to the Royal Commission into Institutional Responses Against Child Abuse as “the Royal Commission.”
3. For academic comment, see, for example, Carol-Ann Hooper and Ann Kaloski, “Rewriting ‘the Paedophile’: A Feminist Reading of *The Woodsman*,” *Feminist Review* 83 (2006): 149–55; Vikki Bell, “The Vigilant(e) Parent and the Paedophile: *The News of the World* Campaign and the Contemporary Governmentality of Child Sexual Abuse,” *Feminist Theory* 3 (2002): 83–102; Michel Foucault, *Abnormal: Lectures at the College de France 1974–1975* (New York: Picador, 2003); and Gillian Harkins, “Foucault, the Family and the Cold Monster of Neo-Liberalism,” in *Foucault, the Family and Politics*, ed. Leon Rocha and Robbie Duschinsky (London: Palgrave MacMillan, 2012), 82–117.
4. Terry Thomas, *Sex Crime: Sex Offending and Society* (Portland: Willan, 2005), 21.
5. Jon Silverman and David Wilson, *Innocence Betrayed: Paedophilia, the Media and Society* (Cambridge: Polity Press, 2002).
6. Monsters are also associated with other genres, including science fiction, comedy, and children’s entertainment; Linda Badley, “Zombie Splatter

- Comedy from Dawn to Shaun: Cannibal Carnival-esque," in *Zombie Culture: Autopsies of the Living Dead*, ed. Shawn McIntosh and Marc Leverette (Maryland: Scarecrow Press, 2008), 33-53. Children's entertainment featuring monsters includes television series such as *Sesame Street* and *The Furchester Hotel* and films such as *Monsters Inc.* Whilst not needing or wishing to engage with the boundary between horror and science fiction, this quotation from Howard Hawks, director of *The Thing*, is thought provoking: "It is important that we don't confuse the *Frankenstein* type of picture with the science fiction picture. The first is an out-and-out horror thriller based on that which is impossible. The science fiction film is based on that which is unknown, but is give credibility by the use of science fiction facts which parallel that which the viewer is asked to believe"; quotation in Mark A. Vieira, *Hollywood Horror: From Gothic to Cosmic* (London: Harry N Abrams, 2003), 163.
7. For example, Austin Sarat and Thomas R. Kearns, *Law in the Domains of Culture* (Ann Arbor: University of Michigan Press, 1998); Richard K. Sherwin, *When Law Goes Pop: The Vanishing Line between Law and Popular Culture* (London: University of Chicago Press, 2000) ; and William P. MacNeil, *Lex Populi: The Jurisprudence of Popular Culture* (Stanford: Stanford University Press, 2007).
 8. Wai Chee Dimock, *Residues of Justice: Literature, Law and Philosophy* (Berkeley: University of California Press, 1996).
 9. The Royal Commission has released a small proportion of stories told by de-identified victims who spoke at private hearings to the public.
 10. Bernadette A. Meyler, "The Myth of Law and Literature. Review of Thane Rosenbaum's *The Myth of Moral Justice: Why Our Legal Systems Fail To Do What's Right*," *Legal Ethics* 8 (2005): 318-25, at 319.
 11. Primo Levi wrote of the pain of the "unlistened-to-story," where his listeners did not follow him, they were completely indifferent; Primo Levi, "Our Nights," *Survival in Auschwitz*, trans. Stuart Woolf (New York: Simon and Schuster, 1996). He expressed the incapacity and unwillingness of his audience to believe, and his frustration of not being believed or heard.
 12. Examples include Honni van Rijswijk, "Encountering Law's Harm through Literary Critique: An Anti-Elegy of Land and Sovereignty," *Law & Literature* 27 (2015): 237-52; Desmond Manderson, *Kangaroo Courts and the Rule of Law: The Legacy of Modernism* (Abingdon: Routledge, 2012); Karin van Marle and Stewart Motha, eds., *Genres of Critique* (Stellenbosch: Sun Press, 2013); Mark Antaki, "Genre, Critique and Human Rights," *University of Toronto Quarterly* 82 (2013): 974-96, Robert Meister, *After Evil: A Politics of Human Rights* (New York: Columbia University Press).
 13. Alistair Fowler, *Kinds of Literature: An Introduction to the Theory of Genres and Modes* (Oxford: Oxford University Press, 1982).
 14. In terms consistent with Ludwig Wittgenstein; Ludwig Wittgenstein, *Philosophical Investigations*, trans. G. E. M. Anscombe (Oxford: Blackwell, 1953).
 15. David Fishelov, *Metaphors of Genre: The Role of Analogies in Genre Theory* (Pennsylvania: Pennsylvania State University Press, 1993), 26.
 16. Adena Rosmarin, *The Power of Genre* (Minneapolis: University of Minnesota Press, 1985), 21.
 17. For example, Fishelov, *Metaphors of Genre*, 12.
 18. John Frow, *Genre: The New Critical Idiom* (Oxford: Routledge, 2005), 7.
 19. Van Rijswijk, "Encountering Law's Harm," 239.
 20. Frow, *Genre: New Critical Idiom*, 2.
 21. Michel Foucault, "So Is It Important to Think?," in *Power: The Essential Works of Michel Foucault 1954-1984*, ed. James D. Faubion (London: Penguin, 2000), 457, 454-8.
 22. Mark Antaki, "The Critical Modernism of Hannah Arendt," *Theoretical Inquiries in Law* 8 (2007): 251-75.
 23. Antaki, "Genre, Critique and Human Rights."
 24. George Gilligan, "Royal Commissions of Inquiry," *Australian and New Zealand Journal of Criminology* 35 (2002): 298-307.
 25. Elena Marchetti has divided this into orthodox and non-orthodox information; Elena Marchetti, "Critical Reflections upon Australia's Royal Commission into Aboriginal Deaths in Custody," *Macquarie Law Journal* 5 (2005): 103, 103-125.
 26. Lisa Flynn, "Some Good Will Come from the Horror of the Royal Commission," *Sydney Morning Herald*, 8 February 2017, <http://www.smh.com.au/comment/some-good-will-come-from-the-horror-of-the-royal-commission-20170208-gu7zt2.html> (accessed February 28, 2017).
 27. Shurlee Swain, *History of Australian Inquiries Reviewing Institutions Providing Care for Children* (October 2014). The failure to deliver meaningful reforms from Royal Commissions is not uncommon. See also Marchetti, "Critical Reflections," 103.
 28. Gilligan, "Royal Commissions of Inquiry."
 29. Joseph Slaughter, *Human Rights, Inc.: The World Novel, Narrative Form, and International Law* (New York: Fordham University Press, 2007).

30. Sandra L. Resodihardj, "Wielding a Double-Edged Sword: The Use of Inquiries at Times of Crisis," *Journal of Contingencies and Crisis Management* 14 (2006): 199-206.
31. Meister, *After Evil*, 64.
32. For example, James B. Twitchell has focused on the "shivers" - and argues that the shiver sensation is a physiological response, e.g., goose bumps; James B. Twitchell, *Dreadful Pleasures: An Anatomy of Modern Horror* (New York: Oxford University Press, 1985), 11.
33. Noel Carroll, *The Philosophy of Horror, Or, Paradoxes of the Heart* (London: Routledge, 1990).
34. Monsters are not confined to the horror genre. Not only do they populate other entertainment forms such as science fiction and children's shows, but also they have also been part of common law; Andrew Sharpe, *Foucault's Monsters and the Challenge of Law* (Abingdon: Routledge, 2010). The category of monster remains relevant to law explicitly and implicitly. For example, see Penny Crofts, "Monstrous Wickedness and the Judgment of Knight," *Griffith Law Review* 21 (2012): 72-100; Penny Crofts, *Wickedness and Crime: Laws of Homicide and Malice* (London: Routledge, 2013); and Phillip Cole, *The Myth of Evil* (London: Edinburgh University Press, 2006).
35. Carroll, *Philosophy of Horror*, 52.
36. Mary Douglas, *Purity and Danger: An Analysis of the Concepts of Pollution and Taboo* (London: Routledge, 1996).
37. For example, *Silence of the Lambs* (Jonathan Demme, 1991, USA) - Hannibal the Cannibal can be regarded as a monster and/or a monstrous human being. The film, which won five academy awards, has been categorized as a thriller and/or a horror.
38. For example, *ZNation* and *The Walking Dead*. There are also comedy horror films that do not arouse horror, including *Shaun of the Dead* (Edgar Wright, 2004, UK).
39. Andrew Tudor, "Why Horror? The Peculiar Pleasures of a Popular Genre," *Cultural Studies* 11 (1989): 443-63.
40. Transcript (Day 163), statement by Mary Elizabeth Donoghue, March 3, 2016, 16507.
41. *Ibid.*, 16508. Case Study 28 Catholic Church Authorities in Ballarat and Case Study 35 Catholic Archdiocese of Melbourne, March 3, 2016, Day 163.
42. Transcript Case Study 35 - Catholic Archdiocese of Melbourne, December 1, 2015 (Day C130), Archbishop Dennis James Hart, 13816.
43. Transcript Case Study 42 - Anglican Diocese of Newcastle, August 8, 2016 (Day C158) Newcastle Court House, Keith William Allen, 16672-73; 16675-76.
44. Transcript Case Study C36 - Church of England Boys' Society, Anglican Dioceses of Tasmania, Adelaide, Sydney and Brisbane, February 2, 2016 (Day C146), Hobart Court, Bishop John Douglas Harrower, C15421.
45. Transcript Case Study 43 - Catholic Church in Maitland/Newcastle, September 5, 2016 (Day C168) Newcastle Court House, Witness CNR, C174934-35.
46. Transcript Case Study C36 - Church of England Boys' Society, Anglican Dioceses of Tasmania, Adelaide, Sydney and Brisbane, February 1, 2016 (Day C145) Hobart Court House, Bishop Phillip Keith Newell, C15374.
47. Transcript Case Study 42 - Anglican Diocese of Newcastle, August 3, 2016 (Day C155) Newcastle Court House, Pamela Wilson 16501-02.
48. Transcript Case Study 42 - Anglican Diocese of Newcastle, August 4, 2016 (Day C156) Newcastle Court House, Bishop Richard Franklin Appleby, 16525-26.
49. See also Transcript Case Study 35 - Catholic Archdiocese of Melbourne, December 3, 2015 (Day C132), Bishop Emeritus Hilton Deacon, 14081-82. This priest, who was a most evil person, doing evil things to little children in a school, and had been doing it for quite some time.
50. Rebekah Ison, "Friendly Priest became a Pedophile 'Monster,'" Australian Associated Press, August 16, 2016, <http://www.news.com.au/national/breaking-news/nsw-catholic-diocese-braces-for-criticism/news-story/e11fe14e0c02564c719e11d65f83bb21> (accessed September 15, 2016). After testifying to the Royal Commission, a victim told the media that the sex offender was a "monster" and "evil."
51. "Evil Depraved Monster Paedophile Shares Chilling Details of Abuse," 7News Adelaide, February 26, 2016, <https://au.news.yahoo.com/sa/a/30938067/evil-depraved-monster-pedophile-shares-chilling-details-of-abuse-and-claims-he-didnt-care-if-he-was-caught/#page1> (accessed September 15, 2016).
52. Tony Wright, "Gerald Risdale: Portrait of a Monster as a Forgetful Old Man," *The Age*, May 28, 2015, <http://www.theage.com.au/victoria/gerald-risdale-por-trait-of-a-monster-as-a-forgetful-old-man-20150527-ghaz4w.html> (accessed September 15, 2016).

53. Jenny Kitzinger, *Framing Abuse: Media Influence and Public Understanding of Sexual Violence Against Children* (London: Pluto, 2004); Jenny Kitzinger, "The 'Paedophile-in-the-Community' Protests: Sex Crimes in the News and Media Audiences as Activists," in *Sex as Crime?*, eds. Gayle Letherby, Kate Williams, Philip Birch, and Maureen Cain (2011), 356-376.
54. For example, see Anneke Meyer's analysis of *The News of the World's* "Name and Shame" campaign; Anneke Meyer, "Evil Monsters and Cunning Perverts: Representing and Regulating the Dangerous Paedophile," in *Popular Culture, Crime and Social Control*, ed. Mathieu Deflem (West Yorkshire: Emerald, 2010), 195-217.
55. Bell, "Vigilant(e) Parent and the Paedophile"; Hooper and Kaloski, "Rewriting 'the Paedophile.'"
56. Kitzinger, *Framing Abuse*.
57. Bill Heberton and Terry Thomas, "Sex Offenders in the Community: Reflections on the Problems of Law, Community and Risk Management in USA, England and Wales," *International Journal of the Sociology of Law* 24 (1996): 427-43. Derryn Hinch named alleged pedophiles under parliamentary privilege in his Australian Federal Parliament Senate speech, labeling pedophiles "human vermin" (September 13, 2017).
58. Philip Jenkins, *Intimate Enemies: Moral Panics in Contemporary Great Britain*; Silverman and Wilson, *Innocence Betrayed: Paedophilia, the Media and Society* (Cambridge: Polity Press, 2002).
59. Foucault, *Abnormal: Lectures at the College de France*, 64-65.
60. Ibid.
61. The classic monsters of horror films, zombies, have been used to explain Derrida's ideas about undecidability. Zombies might be "EITHER alive OR dead. But it cuts across these categories: it is BOTH alive AND dead. Equally, it is NEITHER alive NOR dead, since it cannot take on the 'full' senses of these terms [...] in terms of life and death, it cannot be decided"; Jeff Collins and Bill Mayblin, *Derrida: A Graphic Guide* (Sydney: Icon, 1996), 17-20.
62. Jeffery Cohen, "Monster Culture," in *Monster Theory: Reading Culture* (Minneapolis: University of Minnesota Press, 1996), 3-25.
63. Barbara Creed, "Horror and the Monstrous Feminine: An imaginary abjection," in *The Dread of Difference: Gender and the Horror Film*, ed. Barry Keith Grant (Austin: University of Texas Press, 1996), 42, 35-63.
64. Foucault, *Abnormal: Lectures at the College de France*, 66. Andrew Sharpe disputes Foucault's assertion of a linear development in monsters and notes that hermaphrodites were not part of the monster category in English common law; Sharpe, *Foucault's Monsters and the Challenge of Law*.
65. For example, Sharpe, *Foucault's Monsters and the Challenge of Law*; Judith Halberstam, *Skin Shows: Gothic Horror and the Technology of Monsters* (Durham: Duke University Press, 1995).
66. Halberstam has argued that "class, race, and nation are subsumed [...] within the monstrous sexual body"; Halberstam, *Skin Shows*, 7.
67. Robin Wood, "An Introduction to the American Horror Film," in *American Nightmare: Essays on the Horror Film*, ed. Andrew Britton (Toronto: Festivals of Festivals, 1979), 216. The quotation continues: "Nowhere is this carried further than in *The Texas Chainsaw Massacre*. Here sexuality is totally perverted from its functions, into sadism, violence, and cannibalism. It is striking that there is no suggestion anywhere that Sally is the object of an overtly sexual threat; she is to be tormented, killed, dismembered, and eaten, but not raped."
68. Most of the rare exceptions are relatively recent and include *Easter Bunny, Kill! Kill!* (2006) (Chad Ferrin, Vicious Circle Films); *Evil Lenko* (David Grieco, Pacific Pictures, 2004); and *Silent House* (Chris Kentis and Laura Lau, LD Entertainment, 2010). In the classic horror film series of the 1980s *Nightmare on Elm Street*, the monster Freddie Krueger was a child killer as a human, who after his death became a monster that could kill teenagers in their dreams (and real life). In the 2010 remake, Fred Krueger was transformed from child killer to child molester (something that Wes Craven had wanted to do in the original 1982 film). Incest is a more common theme - whether explicitly or implicitly. Debates about representations of serious harms have also been expressed with regard to fictional portrayals of the Holocaust. For example, see the special issue of *Law & Literature* 16, no. 2 (2004).
69. Recent portrayals of these characters have questioned and explored their "hero" status.
70. Marina Warner, *No Go the Bogeyman: Scaring, Lulling, and Making Mock* (New York: Farrar, Straus & Giroux, 1998).
71. Martha Nussbaum, "Secret Sewers of Vice: Disgust, Bodies and the Law," in *The Passions of Law*, ed. Susan Bandes (New York: NYU Press, 1999), 17-62.
72. For example, Paul Johnson, "Law, Morality and Disgust: The Regulation of 'Extreme Pornography' in England and Wales," *Social and Legal Studies* 19

- (2011): 147–63; and Lord Patrick Devlin, *The Enforcement of Morality* (London: Oxford University Press, 1965).
73. William Ian Miller, *The Anatomy of Disgust*, 2 (Boston: Harvard University Press, 1997).
74. Carroll, *Philosophy of Horror*, 32.
75. Miller, *Anatomy of Disgust*, 204.
76. Royal Commission, *Report of Case Study No. 18: The Response of the Australian Christian Churches and Affiliated Pentecostal Churches to Allegations of Child Sexual Abuse*, 73.
77. *Ibid.*, 68.
78. Miller, *Anatomy of Disgust*.
79. Transcript Case Study 42 – Anglican Diocese of Newcastle, August 9, 2016 (Day C159) Newcastle Court House, Witness CKH, C16877–78.
80. Transcript Case Study 32 – Geelong Grammar School, September 4, 2015 (Day C099), Malcolm Powys, C10294–95.
81. Royal Commission, *Report of Case Study No. 18*.
82. Kirsten Moana Thompson, *Apocalyptic Dread: American Film at the Turn of the Millennium* (Albany, NY: State of University NY Press, 2007); Leanne Franklin and John Cromby, *Everyday Fear: Parenting and Childhood in a Culture of Fear* (Albany: SUNY Press, 2007). Sometimes the family is the monster or breeds a monster, such as *The Texas Chainsaw Massacre*, *Rosemary's Baby* (1968), and *The Omen* (1976). Another plot is the horror of the family; Vivian Sobchack, *Bringing It All Back Home: Family Economy and Generic Exchange* (Austin: University of Texas, 2015).
83. Wood, "Introduction to the American Horror Film," 208.
84. Horror theorists have argued that the stranger forces resolution of underlying issues that already existed in the family. See, for example, the analyses of *The Exorcist*: Barbara Creed, *The Monstrous Feminine: Film, Feminism, Psychoanalysis* (London and New York: Routledge, 1993); and Penny Crofts, "Monstrous Bodily Excess in the Exorcist as a Supplement to Law's Accounts of Culpability," *Griffith Law Review* 24 (2015): 372–94.
85. There are a variety reasons of why news reports do not focus on sex offenders within the family – especially because this would mean "outing" the victims.
86. Royal Commission, *Report of Case Study No. 18*, 11.
87. *Ibid.*, 72.
88. *Ibid.*
89. Royal Commission, *Report of Case Study No. 12: The Response of an Independent School in Perth to Concerns Raised about the Conduct of a Teacher between 1999 and 2009*, 31.
90. Sometimes the back story or explanation of a monster is not given at all. This lack of explanation can also be terrifying. For example, in *It Follows*, no explanation is given for the monster at all. It just is.
91. A religious perspective labels this as a problem of evil. If evil and suffering exist, then God is either not omnipotent, not omniscient, or not perfectly good. A classic explanation for this is that evil is not a positive presence but an absence of grace or distance from God. See, for example, Thomas Aquinas, *On Evil*, trans. Richard Regan (New York: Oxford University Press, 2003). This kind of classic, negative model of wickedness is rarely if ever portrayed in horror – as it lacks the magisterial, entertaining character of a positive, mythical, monstrous wickedness. See further: Mary Midgley, *Wickedness: A Philosophical Essay* (London, Routledge, 1984).
92. Royal Commission, *Report of Case Study No. 2: YMCA NSW's Response to the Conduct of Jonathan Lord*.
93. See also Royal Commission, *Report of Case Study No. 37: The Response of the Australian Institute of Music and RG Dance to Allegations of Child Sexual Abuse*. Although Grant Davies was openly "handsy," unprofessional, and inappropriate, including sexualized outfits and choreography and texting students after midnight, parents and staff did not recognize that Davies was sexually abusing dancers.
94. Dave McDonald, "Ungovernable Monsters: Law, Paedophilia, Crisis," *Griffith Law Review* 21 (2012), 585–608.
95. Film directors have realized that our imaginations create better monsters than they can show, thus frequently monsters are not revealed until quite late in a film. A recent exception to this is the Master vampire in *The Strain*. Although retaining some connection to his humanity, his face looks like a victim of too much plastic surgery – and he is double the size of normal humans and moves faster than the eye can see.
96. Hyde raises a fear, an antagonism, and a deep loathing in other people. The reaction of others to him is one of horror, partly because while looking at him, others feel a deep desire to strike out and kill him. In other words, his mere physical appearance brings out the very worst evil in other people.
97. An attribute of some monsters is that just the sight of them can be harmful. Medusa provides an early example, but in contemporary fiction there is the idea of vampires "glamouring" their victims.

98. The villains of James Bond films almost always have some kind of physical disfigurement which makes them easily recognizable as baddies; Victoria Wright, "Why do Bond Villians Need Facial Scars?," *The Independent*, November 6, 2012.
99. I disagree with Halberstam's assertion that the postmodern horror film has transformed the Gothic monster of the 19th century into an instantly recognizable "beast who is all body and no soul"; Halberstam, *Skin Shows*, 1.
100. The unrecognizable monster has long been represented in horror. For example, with an alien "thing" which is a shape-shifting malevolent creature that assumes the form of its victims in order to kill more of the trapped explorers, 1950s' films such *The Thing From Another World* (Howard Hawks, 1951) expressed the paranoia of the Cold War era and McCarthyism; Kendall R. Phillips, *Projected Fears: Horror Films and American Culture 2* (Westport: Greenwood, 2005).
101. Kitzinger, *Framing Abuse*.
102. Halberstam argues that racism and xenophobia are underlying themes of Gothic and contemporary horror; Halberstam, *Skin Shows*.
103. Julia Kristeva, *Powers of Horror: An Essay on Abjection* (New York: Columbia University Press, 1982), 4.
104. Transcript Case Study 35 - Catholic Archdiocese of Melbourne, December 1, 2015 (Day C130), Archbishop Dennis James Hart, 13814.
105. Ison, "Friendly Priest became a Pedophile 'Monster.'"
106. Royal Commission, *Report of Case Study No. 2*.
107. See also Transcript Case Study 32, Geelong Grammar School, September 10, 2015 (Day 103), Witness BLW, C10828. When I made the disclosure about my brother's abuse, Sampson responded immediately, saying, "He is a dangerous and manipulative man who has for many years slipped through the net." He then said something along the lines of, "Our suspicions are that he has done this to many students over many years and we have never caught him out because nobody has ever written a letter of complaint. He is an evil man."
108. Meyer, "Evil Monsters and Cunning Perverts," 203.
109. Some philosophers have argued that it is inhuman willfully to destroy and harm other humans for no purpose other than pleasure.
110. In *Land of the Dead*, the zombies like fireworks and this distracts them from their prey. The film also presents zombies as evolving to develop intelligence.
111. "He who fights with monsters should look to it that he himself does not become a monster. And if you gaze long into an abyss, the abyss also gazes into you"; Friedrich Nietzsche [1886], *Beyond Good and Evil* trans. Helen Zimmern (New York: Dover Publications, 1997), 46, 30-48.
112. Royal Commission, *Report of Case Study No. 12*, 32.
113. Ibid.
114. Royal Commission, *Report of Case Study No. 9: The Responses of the Catholic Archdiocese of Adelaide, and the South Australian Police, to Allegations of Child Sexual Abuse at St Ann's Special School*.
115. In *A Nightmare on Elm Street 4: The Dream Master*, a mother indirectly causes her daughter's death by giving her sleeping pills that leave her vulnerable to Freddie's assault.
116. For example, see the current *Scream* series and *Nightmare on Elm Street*.
117. Royal Commission, *Report of Case Study No. 2*.
118. For example, management did not contact referees and did not undertake police checks in Royal Commission, *Report of Case Study No. 9*.
119. Royal Commission, *Report of Case Study No. 2*.
120. Badley, *Zombie Splatter Comedy*.
121. Royal Commission, *Report of Case Study No. 2*.
122. Ibid.
123. For example, see Royal Commission, *Report of Case Study No. 15: Response of Swimming Institutions, the Queensland and NSW Offices of the DPP and the Queensland Commission for Children and Young People and Child Guardian to Allegations of Child Sexual Abuse by Swimming Coaches*. In that report, Swimming Australia and Swimming Queensland allowed unsupervised access to children by Scott Volkers, even after sexual abuse allegations had been made against him. In fact, Swimming Queensland employed Volkers after the allegations had been made. See also Royal Commission, *Report of Case Study No. 2*; and Royal Commission, *Report of Case Study No. 9*.
124. For example, the driver of the school bus for children with disabilities was frequently late in dropping off children. It was during this time that he offended against the children; Royal Commission, *Report of Case Study No. 9*, 16-17.
125. Cole, *Myth of Evil*.
126. Ibid., 103.
127. Meyer, "Evil Monsters and Cunning Perverts"; Kitzinger, "'Paedophile-in-the-Community'"; Richard Wortley and Stephen Smallbone, eds., *Situational Prevention of Child Sexual Abuse* (Monsey: Criminal Justice Press, 2006).
128. Robin Wood, *Hollywood from Vietnam to Reagan* (New York: Columbia University Press, 1986), 75.

129. Linda Ruth Williams, "The Inside-Out of Masculinity: David Cronenberg's *Visceral Pleasures*," in *The Body's Perilous Pleasures: Dangerous Desires and Contemporary Culture*, ed. Michele Aaron (Edinburgh: Edinburgh University Press, 1999), 34.
130. *The Omen*, director's cut.
131. For example, in *28 Days Later*, scientists create the rage virus in order to study and perhaps cure the human emotion of rage. In the *Alien* series, the corporation regards the alien as a potential military weapon. In the spooky Netflix series *Stranger Things*, the government and a mad scientist are undertaking experiments that have unleashed a monster on a small American town.
132. Stephen King's novels *It* and *The Shining* emphasize that the town was already dead or rotten before the monster started attacking.
133. Penny Crofts, "Legal Irresponsibility and Institutional Responses to Child Sex Abuse," *Law in Context* 34 (2016): 79-99.
134. Scott Veitch, *Law and Irresponsibility: On the Legitimation of Human Suffering* (New York: Routledge, 2007), 3.
135. Hannah Arendt, *Eichmann in Jerusalem: A Report on the Banality of Evil* (New York: Penguin, 1994), 276.
136. "Rather than condoning the perversity they recorded, Gothic authors, in fact, seemed quite scrupulous about taking a moral stand against the unnatural acts that produce monstrosity"; Halberstam, *Skin Shows*, 12.
137. Cynthia Freeland, *The Naked and the Undead: Evil and the Appeal of Horror* (Boulder, CO: Westview, 2000), 5.
138. Wood, "Introduction to the American Horror Film," 215.
139. Halberstam, *Skin Shows*, 27.
140. Donna Haraway, *The Promise of Monsters: A Regenerative Politics for Inappropriate/d Others* (New York: Routledge, 1992), 295-337.
141. *Ibid.*; Sharpe, *Foucault's Monsters and the Challenge of Law*; Crofts, "Monstrous Wickedness and the Judgment of Knight."
142. Michel Foucault, *The History of Sexuality Volume 1* (Paris: Gallimard, 1976), 101.
143. For example, Stephen Donaghue, *Royal Commissions and Permanent Commissions of Inquiry* (Butterworths, Sydney: 2001); Leonard Arthur Hallett, *Royal Commissions and Boards of Inquiry: Some Legal and Procedural Aspects* (Sydney: Law Book Company, 1982); A. Paul Pross, Innis Christie, and John A. Yogis, eds., *Commissions of Inquiry* (Toronto: Carswell, 1990); Janet Ransley, *Inquisitorial Royal Commissions and the Investigation of Political Wrongdoing* (Ph.D. thesis, Griffith University, 2001); Tom Sherman, *Executive Inquiries in Australia: Some Proposals for Reform. Law and Policy Paper No 8* (Canberra: Australian National University, 1997); and Patrick Weller, ed., *Royal Commissions and the Making of Public Policy* (Brisbane: Macmillan Education, 1994).
144. Nussbaum, "Secret Sewers of Vice."
145. Stephen Neale, *Genre* (British Film Institute, 1980), 22.

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