

### Terms of Reference

To **seek to** establish:

- whether or not any concerns were raised about any of the following:
  - the use of diamorphine [or any other opiate substance] ; or
  - prescribing regimes; or
  - the use of syringe drivers to administer medication;in relation to the treatment of patients at Gosport War Memorial Hospital (“the Hospital”) at any time between 1988 and 1998;
- If so, the way in which any such concerns were raised, by whom, to whom and when;
- What action (if any) was taken (and by whom) as a result of any such concerns and when;
- The effect (if any) that any action taken had, on any of:
  - the use of diamorphine [or any other opiate substance]; or
  - prescribing regimes; or
  - the use of syringe drivers to administer medication;within the Hospital in that period.
- Whether any action taken **at the time** was justified, in all the relevant circumstances;
- Whether any failure or omission to act **at the time** was justified in all the relevant circumstances;
- Whether any events at the Hospital (such as but not limited to patient deaths, untoward incident reports or complaints) during the period in question should have prompted those with management and/or clinical management responsibility for the Hospital at the time to take any steps, and if so, what steps and whether such steps were in fact taken;

- Whether any individual working at the Hospital or working in a post which involved responsibility for either clinical or administrative matters at the Hospital during the period in question either :
  - acted; or
  - failed to act; or
  - omitted to act; or
  - neglected to actin an appropriate manner in response to any such concerns or events, given their level of knowledge, seniority, experience and responsibilities at the relevant time.