

# GLANVILLES

SOLICITORS

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PARTNERS  
Paul Bateman  
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Nicola Crookes-West  
Robert Gardiner  
Edward Giles  
Graham Lambie \*  
Peter Latham †  
Susan Ledger ‡  
James Melrose  
Graham Parsons  
Peter Ricks  
Roger Rixon  
Colin Samuelson \*  
Charles Small \*  
Charlotte Woodhouse

Strictly Private & Confidential

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Web [www.glanvilles.co.uk](http://www.glanvilles.co.uk)

† Senior partner  
‡ Managing partner  
\* also a Notary Public

Your ref.

ASSOCIATES

Our ref. Mjh/34387/1

David Bridge  
Nick Hessey

Also By Fax: 023-92-580-360

Monday, 05 February 2001

### Carbon Copies To:-

Mr Max Millett; Ms Maureen Mills; Mr Peter King, Personnel Director; Ms Lorna Green, Business Manager - **Strictly Private & Confidential**

Dear Madam

Code A v- Portsmouth Health Care Trust

We refer to our letter of Monday 29 January 2001 a copy of which is enclosed.

We note that we have not received any response of any kind. Our Mark Hannington has since also had the opportunity to speak with Ms Green, in the absence of Mr Millett. He requested then that urgent investigations into the management practices at Redclyffe House be undertaken. We have received no confirmation that this has occurred. We feel that we must request the information requested in our previous letter and telephone call be sent to this office by **not later than Monday 12 February 2001**. If this date is not acceptable, please indicate when we can expect a response.

Our client has been advised that the investigation into her employment that is currently being undertaken by Ms Jan Peach at Redclyffe House is flawed. For the record, it concerns our client that there have been no interviews carried out with agency staff at the hospital, more particularly, no interviews have been carried out with any of the BUPA staff that work there. In addition, we note that there are three separate letters of complaint that are the subject of the current investigation. It is our client's request that all three letters be taken as *separate complaints* and that they are not taken together.

Further, our client requires an outcome from the current investigation by **not later than Monday 26 February 2001**. If that date is not acceptable, please inform us of the date by which we can expect a response. By the agreed date our client should be informed of the outcome of the investigation, that is, one of the following:-

1. That the disciplinary procedure is "formally" invoked;
2. That the allegations against our client are unfounded and that the complaints have no substance, or,

**GLANVILLES**  
SOLICITORS

3. That some other action will be taken.

Finally, our client must be taken through the fair and reasonable procedures of the Trust. Please therefore indicate to us which procedure our client is currently being investigated under, as from the two letters enclosed it is not clear, particularly from the latter letter.

There are two letters to our client from the Trust that note complaints (copies enclosed). The first letter was the start of the investigation referred to in paragraph 4 of this letter. The second letter does not yet appear to have been formally investigated, so far as our client is aware. If this is also being investigated, please inform us. The complaint noted in the latter letter should also be handled separately.

We look forward to your urgent and fully substantive response.

Yours faithfully

**Code A**

**Glanvilles**

**cc. Max Millett, St James' Hospital, Locksway Road, Portsmouth, HANTS, PO4 8LD.**

**F: Code A**

**cc. Maureen Mills, Personnel Manager.**

**cc. Peter King, Personnel Director.**

**cc. Lorna Green, Business Manager.**

# **GLANVILLES**

**SOLICITORS**

## **Strictly Private & Confidential**

Mrs Bridget Howes  
Clinical Co-ordinator, EMH, Gosport  
Gosport War Memorial Hospital  
Bury Road  
Gosport  
HANTS.PO12 3PW

151 West Street  
Fareham  
Hampshire PO16 0DZ

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**ASSOCIATES**

David Bridge  
Nick Hessey

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Monday, 29 January 2001

Carbon Copies To:-

Mr Max Millett - **Strictly Private & Confidential**  
Ms Maureen Mills - **Strictly Private & Confidential**

Dear Madam

**Mrs J Kelly**

We are instructed by Mrs Jean Kelly.

We hold several documents under legal professional privilege on our client's behalf. Our client has handed over the employment matters relating to her employment with Portsmouth Health Care Trust, specifically Redclyffe House, to us. We note that there is a letter outstanding to our client dated 17 January 2001 from Mrs Bridget Howes and carbon copied to Maureen Mills in Personnel.

Our client is suffering from severe stress at this time, is on medication for the same, and has been signed off work until 2.2.01 with nervous debility as a result. The content of the letter dated above caused our client great concern and in her view thoroughly exacerbated her medical condition. Please therefore do not address any further correspondence to our client or make any contact with her. All correspondence is to be directed through this firm until further notice.

In the meantime, we request the following as a matter of urgency:-

- Copy of the Staff Handbook.
- Copy of the signed contract(s) between our client and yourselves.
- A Grievance Procedure Form - if there is a specific form for this.
- A full copy of the Harassment and Bullying procedures of the Trust, to include the procedure on any complaint of this nature.
- A full copy of the procedure that managers should undertake in disciplinary situations.
- A full copy of the health and safety procedures of the Trust.

**GLANVILLES**  
SOLICITORS

- A full copy of the last report from any inspection that has ever been undertaken by an inspector into the management, supervision and operations at Redclyffe House in Gosport.
- Any procedural documents that are unique to Redclyffe House, its management and staff.

Should you have any questions about this matter please contact our Mark Hannington at the Fareham office.

Yours faithfully

**Glanvilles**

**cc. Max Millett, St James' Hospital, Locksway Road, Portsmouth, HANTS, PO4 8LD.**

**F: Code A**

**cc. Maureen Mills, Personnel Manager.**

PORTSMOUTH  
**HealthCare**  
NHS  
TRUST

**Code A**

Our ref  
BDH/syn  
Your ref

Date  
03 January 2001  
Ext  
2269

Dear Jean

Further to our meeting today, I am writing to confirm that an investigation will take place into the following allegations:

- That you left HCSW's unsupervised whilst working on nights at Redclyffe House
- That you shouted at other HCSW's working with you at Redclyffe House

An investigating officer will contact you shortly to arrange for you to make a written statement. You have the right to be represented at this meeting by a person of your choice. You will receive written confirmation of the outcome of the investigation which should be completed within one month, at which stage a decision will be made as to whether or not to hold a disciplinary hearing.

During the investigation the following restrictions have been place on your duties:

- You will be based at Phoenix Day Hospital for 4 duties per week and one duty on Mulberry Ward at W/E.

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Clinical Co-ordinator, EMH, Gosport  
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