

Bradley, Andrew

To: Stephenson, Roy
Subject: RE: Gosport Inquest

Dear Roy,

I have no objection to the release of the records provided we can get an undertaking for safe custody and confirmation that they will be available to the Interested Persons at the Inquests and it would be helpful if you could get the confirmation from him in terms.

Let me know if there is any problem. Have a good weekend.

Andrew Bradley
HMC

From: Stephenson, Roy [Code A]
Sent: 19 December 2008 10:30
To: Bradley, Andrew
Subject: FW: Gosport Inquest

Mr Bradley

Can you confirm that you are willing for the original medical records be released to Mills and Reeve, along with the drug registers, I have copies of the relevant pages of the register. It may be a consideration as there are other interested parties that we hold on to them and make them available for everyone to view.

I have informed Mills and Reeve that I will contact them again at the beginning of next week.

Roy Stephenson
07880 900921

From: Chikodi Oraka [Code A]
Sent: 18 December 2008 11:58
To: Stephenson, Roy
Subject: Gosport Inquest

Please see attached letters.

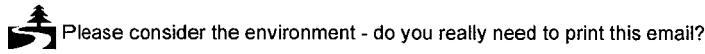
Chikodi Oraka
Paralegal
for Mills & Reeve LLP

[Code A]

<http://www.mills-reeve.com>

<<Email to R Stephenson.DOC>> <<Hampshire PCT - Gosport Inquests.DOC>>

19/12/2008



Season's Greetings from Mills & Reeve. To reduce our impact on the environment we will be donating money to local homeless charities rather than sending Christmas cards. The charities benefiting are: St Basil's in Birmingham, Jimmy's Night Shelter in Cambridge, St George's Crypt in Leeds, The Whitechapel Mission in London, Lifeshare in Manchester and St Martin's Housing Trust in Norwich. Best wishes for Christmas and a happy and peaceful New Year.

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Your reference:
Our reference: BSPK/4007152-
0002/BJZM
Document number: 74716140_1.doc

Code A

Detective Sergeant **Code A**

1 December 2008

Sent by email only:

Code A

Dear Detective Sergeant **Code A**

Hampshire PCT - Gosport Inquests

I refer to my letter of 31 October 2008.

I am actively reviewing this matter with the NHS and I would be grateful if you could confirm the schedule of documents which you are holding in this matter, so that I can review it with my clients to determine whether or not there are any documents which we may wish to see prior to the inquest.

I assume that you are holding original documentation and now that there is no criminal proceedings contemplated, I would formally request that they be returned to my clients for safe-keeping.

I have heard from the Coroner, who informs me that he is content for the original medical records to be copied and then returned to the NHS.

I would be grateful if I could hear from you by return on this matter and if, of course, you have any questions, please do not hesitate to contact me. Many thanks for your assistance.

Yours sincerely

Stuart Knowles
Consultant
for Mills & Reeve LLP

cc: Detective Superintendent David Williams **Code A**

Season's Greetings from Mills & Reeve. To reduce our impact on the environment we will be donating money to local homeless charities rather than sending Christmas cards. The charities benefiting are: St Basil's in Birmingham, Jimmy's Night Shelter in Cambridge, St George's Crypt in Leeds, The Whitechapel Mission in London, Lifeshare in Manchester and St Martin's Housing Trust in Norwich. Best wishes for Christmas and a happy and peaceful New Year.

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Your reference:
 Our reference: BSPK/4007152-
 0002/BJZM
 Document number: 74848021_1.doc

Code A

Detective Sergeant **Code A**

17 December 2008

Sent by email only:

Code A

Dear Detective Sergeant **Code A**

Hampshire PCT- Gosport Inquests

I refer to my letters of 1 December 2008 and 31 October 2008. I am a little disappointed not to have had any response.

I am actively reviewing this matter with my client and I am aware that you hold original documentation such as the controlled drug register. Since you have concluded your investigations, I can see no reason for these documents to be retained by the force.

The drug register will assist me in clarifying the exact dosage of opioids administered to patients at any given time and is of the utmost importance at this stage of our preparation to assist the coroner at the forthcoming inquest.

I hope you will appreciate that the information within these documents is crucial and as such, I repeat my request that they be returned to my clients immediately.

I would be grateful if I could hear from you by return on this matter. Many thanks for your assistance.

Yours sincerely

Stuart Knowles
 Consultant
 for Mills & Reeve LLP

cc: Detective Superintendent David Williams **Code A**
 Richard Samuel **Code A**
 Peter Mellor **Code A**

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Your reference:
 Our reference: BSPK/4007152-
 0002/BJZM
 Document number: 74463214_1.doc

Code A

Mr **Code A**

31 October 2008

By email only **Code A**

Dear Detective Sergeant **Code A**

Hampshire PCT – Gosport Inquests

I have been asked to email you by Detective Superintendent David Williams.

I am instructed by Hampshire Primary Care Trust and Portsmouth Hospitals NHS Trust to represent the interests of the NHS at the forthcoming inquests into several deaths which occurred in the 1990's at Gosport War Memorial Hospital.

I have been in touch with the Coroner directly but I understand that your office is acting as the Coroner's Officer in this particular case.

I have made a request to the Coroner in writing for the release of the original medical records although I have yet to hear from him. In my discussions with Detective Superintendent Williams, he suggested that I should contact you to make a formal request for the release of the original medical records. It is my understanding that the police enquiry has been concluded long ago. I assume the original notes were taken as part of the original investigation and I suspect that they were probably handed over voluntarily. I was not involved at the time, but that would be the usual practice of the NHS. I believe the notes should be available for the inquest and they will need to be proved by various witnesses. I understand there may be witness statements and transcripts available which of course would be very helpful. I will of course advise the NHS that someone should be available in court to admit the evidence.

Having said that, in the meantime, I believe they remain the property of the NHS and as I am sure you will appreciate there can now be no suggestion of them being fraudulently altered. It is my view that there is no power for the Coroner to retain this notes or for the police to retain them at the request of the Coroner. They contain sensitive personal data which should be returned to the NHS. Their return into the custody of the NHS would of course assist my clients greatly because it would be appropriate for the witnesses to refresh their memories of these events by reference, not only to their statements, but also to the original notes.

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I suspect the Coroner will require bundles of medical records to be available for the interested parties and perhaps for himself and the jury.

I would be happy to liaise with yourself and the NHS in order that appropriately bundled and paginated medical records can remain available to assist the Coroner.

I look forward to hearing from you and if you have any questions, please do not hesitate to contact me and perhaps you would be kind enough to confirm that the originals can be returned to the NHS and I will make the necessary arrangements.

I am also informed by Detective Superintendent Williams that there is an extensive exhibit list and that you are holding extensive reports and documents which all went to the CPS. Would it be possible for you to forward to me a copy of the exhibit lists to indicate what the police are still holding and whether or not you are holding originals.

I am grateful to you in anticipation of your assistance and I look forward to hearing from you.

Yours sincerely

Stuart Knowles
Consultant
for Mills & Reeve LLP

cc. Detective Superintendent David Williams (**Code A**)

HM Assistant Deputy Coroner, Mr A Bradley, Goldings, London Road, Basingstoke,
RG21 4AN