

Report to Hampshire Primary Care Trust and Portsmouth Hospital NHS Trust Gosport

Inquests

November 2008

Current position

Since the last meeting of the Steering Group on the 10th October, the following actions have taken place:

1 Liaison with the Coroner.

The hearing date is now confirmed as 18 March 2009. The date has changed from 9th March due to court availability. The Coroner has disclosed some 88 witness statements which have been indexed and copied.

2. Liaisons with the Police.

The Police have confirmed they are holding the original medical records. It is not clear on what basis they continue to retain this sensitive personal data and I assume they were originally released voluntarily. These documents will be required at the hearing but I have requested that they be returned to the safekeeping of the NHS pending the inquest and to enable witnesses to refresh their memories. This request will be kept under review. I have made contact with the senior officer in charge who has been helpful. The police are holding over 2000 exhibits. Many will probably be irrelevant but I am seeking a list to review. I continue to liaise with the Police and the Coroner in this respect.

3. Liasons with counsel's clerk

Code A from **Code A** has been retained. A CV is attached. In due course, it is anticipated that there will need to be a conference with counsel.

4. Witnesses

Extensive discussions have taken place with Lesley Humphrey who is currently the Divisional Manager. A preliminary draft statement has been prepared and is with Lesley for additions and amendments to be made. The statement is intended to serve 3 purposes, firstly to provide a detailed background into this matter, for the

Coroner and for the NHS. Secondly to detail the actions that have been taken since the deaths and the publication of the CHI report into the deaths and thirdly to detail the changes to the service that have taken place . Although the statement is currently in **Code A** name it is possible that it will form the basis for evidence to be given by others at the inquest.

Liaising with various members of staff and updating as appropriate.

5 Media

Liaison with Trimedia and taking receipt of a substantial folio of press and media cuttings.

Future activity

In the next few weeks, it is anticipated that we will continue to liaise with the Coroner and the police over procedural requirements, the documentation and the NHS records. We are in contact with **Code A** at Hampshire PCT and a date is being set for us to review all documentation held at the PCT to determine whether there is any relevant documentation of importance to this inquest. We are hoping to arrange this review to take place when we have received the exhibit list from the police. This will be compared with the evidence set out in the witness statements and in the police exhibit list. We will advise on disclosure.

We will continue to liaise with Lesley Humphrey and to finalise her statement concentrating on providing assurance to the NHS and to the Coroner as to the current state of the service and the changes that have taken place since these deaths occurred and as a result of the CHI review.

We will identify additional witnesses if necessary and take statements and assist. We are already in touch with Dr Ian Reid (Consultant Geriatrician).

We will review the witness statements disclosed by the Coroner and identify staff who may require assistance and advise accordingly. We will liaise with you in respect of liaising if required with professional organisations for nursing and medical staff.

We will liaise with Lesley Humphrey and review documentation held at the Acute Trust and advise accordingly.

We will review any potential conflict with staff and advise accordingly. We will advise with regard to representation and support for those members of staff.

Activity

Recorded hours on this matter currently total **Code A** with a value of **Code A**. The original estimate was in the sum of around **Code A** that remains my estimate, subject to review and likely future activity. A brief fee has yet to be agreed with counsel but has been suggested by counsel's clerk to be around **Code A**.

Code B

3rd November 2008