

Witness Statement Ref. No. 267/1

**NAME OF CHILD:** Claire Roberts

**Name:** Gerry Carson

**Title:** Mr.

**Present position and institution:** RETIRED.

**Previous position and institution:**

*[As at the time of the child's death]*

Director of Corporate Affairs - Royal Group Hospitals Trust

**Membership of Advisory Panels and Committees:**

*[Identify by date and title all of those between January 1995-August 2012]*

Ans :NONE

**Previous Statements, Depositions and Reports:**

*[Identify by date and title all those made in relation to the child's death]*

Ans: NONE

**OFFICIAL USE:**

**List of previous statements, depositions and reports attached:**

Ref:	Date:	

**IMPORTANT INSTRUCTIONS FOR ANSWERING:**

*Please attach additional sheets if more space is required. Please identify clearly any document to which you refer or rely upon for your answer. If the document has an Inquiry reference number, e.g. Ref: 049-001-001 which is 'Chart No.1 Old Notes', then please provide that number. If the document does not have such a number then please provide a copy of the document.*

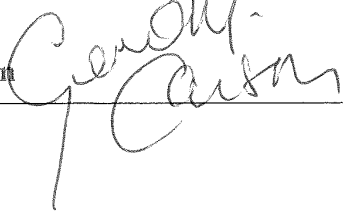
- (1) Please state your qualifications as at 1996;** R: 26 years media and public affairs experience
- (2) Please describe your career history before you were appointed Directorate of Corporate Affairs/Public Affairs and Media;** R: 1977-1993 –Head of Press and Public Relations at the Eastern Health and Social Services Board. 1976-77 Deputy Head of Press and PR at EHSSB. 1974-76 Executive Officer EHSSB. 1970 -74 Faculty Administrator NI Polytechnic College. (Since 1966 until present, part time non conflicting role as freelance sports writer and broadcaster)
- (3) Please provide information regarding your work at the RGH from the date of your appointment;** R: Internal and external communications including internal communications, 24 hours media services, print production, marketing, special events, VIP visits and Disaster Team membership.
- (4) Please describe the role, function and accountability of your post as at 1996 and 2004, including those individuals to whom you reported, and who reported to you;** R: (1) To give advice to the Chief Executive and Chairman on all matters relating to the Directorate of Corporate Affairs services (2) to deliver with- in budget all Directorate services. (3) The staff of the Directorate, both professional and administrative.
- (5) Was there a written job description for your post in 1996 and/or 2004? If so, please provide copy of the same.** R: There was one when the post was advertised prior to 1996 but I no longer have a copy of the document. Perhaps the current HR department can help. I took early retirement in 2002 therefore I cannot comment on events which took place in 2004.
- (6) Please identify your predecessor and successor in post;** R: (1) There was no predecessor, I was the first Director of PR/Corporate Affairs at the Royal group. (2) Dympna Curley, also now retired.
- (7) Please describe any changes in your role, function and accountability upon becoming Director of Public Affairs and Media, including those individuals to whom you reported and who reported to you;** R: There were incremental changes as we were always trying to find ways of improving current services and providing better and newer activities. For example the Trust won UK national awards for the production of both the Annual Report and the monthly staff newspaper. Please refer to my answer at 4 above for who I was responsible to, and who reported to me.
- (8) Please state whether you were aware of the cases of Adam Strain and Claire Roberts in 1996 and/or 2004 and if so please describe the extent of your knowledge;** (1) 1996- I might have been but I cannot remember exactly- if press statements were issued then file copies might still be available. (2) The UTV programme was broadcast in 2004, two years after my retirement.
- (9) Please state whether you had any engagement with or role in the cases of Adam Strain and Claire Roberts and if so please provide full details of the same including:**

- (a) **Any and all advices sought and received;** R: If there had been media interest in either of these two cases (and indeed in any such case) guidance would have been sought from the trust Litigation Office / Chief Executive/medical director and any statement by these offices before being issued.
- (b) **Any and all information sought and received.** R: As I am retired I have no access to old files or press statements but perhaps the current department can help with checking if statements were made. It is of course possible that statements might have been prepared in case of media interest but were never issued.
- (10) **Please state when the case of Claire Roberts first came to your attention and the circumstances of the same.** R: I cannot remember Claire's case but became aware of it today when the Belfast Trust's Litigation Office sent me this questionnaire.
- (11) **Please provide full details of the day to day functions of Corporate Affairs/Public Affairs and Media in 1996 and/or 2004, including:**
- (a) **The kind of matters Corporate Affairs/Public Affairs and Media would have been involved in;** R: 1996- internal communications, media information - proactive and reactive, public affairs (working with elected representatives and external organisations)- print production (everything from patients information leaflets to the monthly staff newspaper, and recruitment advert drafting), event management, business planning and budgetary control.
- (b) **The primary individuals with whom Corporate Affairs/Public Affairs and Media would have liaised/worked, and/or received instructions from;** R: 1996- (1) members of the Hospital Council, senior staff across the trust, staff at various levels depending on the service required .(2) The Chief Executive/Board Chairman, other fellow directors.
- (c) **The protocols, guidelines and practices governing Corporate Affairs/Public Affairs and Media;** R: 1996 - Patients, clients and their families came first so the normal hospital and social services rules regarding patient and client confidentiality were strictly observed. In addition the National Union of Journalists' code of practice and ethics were strictly adhered to, as were guidelines from the Association of Healthcare Communicators (UK). I regret that I no longer have copies of these protocols.
- (d) **How such protocols, guidelines and practices were implemented, monitored and supervised to ensure compliance, and by whom.** R: 1996- through training, staff assessments and daily supervision of all work output, either by me or the head of medical photography.
- R: 2004 -I have given no comment regarding 2004 as I was no longer in post.
- (12) **In respect of the UTV Insight documentary ('When Hospitals Kill'- 21<sup>st</sup> October 2004) please state:** R: As I was no longer in post I am unable to answer any of these questions.
- (a) **The role Corporate Affairs/Public Affairs and Media played in respect of this programme;**
- (b) **The approach taken by Corporate Affairs/Public Affairs and Media in relation to this programme and under whose instruction;**
- (c) **Was a connection made by the Trust/RBHSC between the programme and the case of Claire Roberts either before or after broadcast?**

- (d) What requests for information and comment were received from UTV;
  - (e) What information and comment was given to UTV, specifying by whom, to whom and when?
  - (f) Please identify those individuals engaged in this process;
  - (g) Who bore responsibility for this process;
  - (h) What internal responses were generated by any such requests;
  - (i) What internal responses were generated by the broadcast of the documentary;
  - (j) What external responses were generated by the same;
  - (k) Whether any record or documentation of this process was made, and if so please provide the same;
  - (l) If same was created, but is now no longer available please state what became of it.
- (13) In respect of the email sent by Ms. Christine Stewart, Press and Public Relations Officer, Royal Hospitals Trust on 20<sup>th</sup> September 2004- *"I've just spoken with Dr. Bob Taylor, Consultant Anaesthetist in PICU, who was involved in the management of Adam Strain and gave evidence at the Inquest. Following a detailed examination of the issues surrounding patient AS there were no new learning points, and therefore no need to disseminate any information"* (Ref: 023-045-105)- please state the following: R: No comment - not in post at the time.
- (a) What department did Ms. Stewart work in?
  - (b) The role, function and accountability of a Press and Public Relations Officer?
  - (c) What role Corporate Affairs/Public Affairs and Media took in relation to Public Relations matters;
  - (d) What steps Corporate Affairs/Public Affairs took in relation to investigating whether there were any new learning points from the case of Adam Strain?
  - (e) What steps Corporate Affairs/Public Affairs took in relation to investigating whether there were any new learning points from the case of Claire Roberts?
  - (f) Who took responsibility for determining whether there was a need for disseminating information, on what basis and under what guidelines, protocol or practice;
  - (g) How were such decisions reviewed, monitored and/or audited to ensure information was being properly disseminated?
- (14) Please provide any further comments you may wish to make; R: I wish the Inquiry team success but am perturbed at the length of time the process is taking
- (15) Please provide any further documents or materials you may wish to include. R: None

**THIS STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF**

**Signed: Gerard M Carson**

A handwritten signature in black ink that reads "Gerard M Carson". The signature is written in a cursive style with a large initial "G" and "C".

**Dated: 01.09.12**