

Witness Statement Ref. No.

260/1

NAME OF CHILD: Adam Strain

Name: Heather Neill

Title: ~~Ms.~~ MRS

Present position and institution:

PRACTICE MANAGER - GP SURGERY

Previous position and institution:

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

OFFICE + LITIGATION MANAGER - BRANGAM, BAGNALL & Co

Membership of Advisory Panels and Committees:

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

NONE

Previous Statements, Depositions and Reports:

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

NONE

OFFICIAL USE:

List of previous statements, depositions and reports:

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 an Inquiry reference number, then please provide a copy of the document attached to your statement.

I. QUERIES IN RELATION TO YOUR EMPLOYMENT WITHIN BRANGAM BAGNALL & CO; ROLES AND RESPONSIBILITIES.

(1) We would be very grateful if you would provide the following information:

- (a) A brief synopsis of your work experience within Brangam Bagnall & Co and please enclose a Curriculum Vitae, showing to date your education, qualifications and employment;

As PER CV

- (b) Please state the capacity in which you were employed at Brangam Bagnall & Co, for how long and between what dates;

MARCH 1995 → SEPT 1996 OFFICE + LITIGATION MANAGER

SEPT 1996 → APRIL 1997 MATERNITY LEAVE

APRIL 1997 → NOV 1998 LITIGATION MANAGER

OCT 2001 → JULY 2002 LEGAL EXECUTIVE

- (c) Please describe your roles, duties and responsibilities while employed at Brangam Bagnall & Co, including details of the kind of projects / cases you were engaged with during that time;

AS PER CV

- (d) Please provide details of any training and instructions you might have received during the course of your employment with Brangam Bagnall & Co specifically in relation to note and minute taking.

NO TRAINING

JUST TOOK NOTES AT CONSULTATIONS + HEARINGS FOR
USE WITHIN THE FIRM

II. QUERIES IN RELATION TO NOTES OF CONSULTATION- 14TH JUNE 1996

(2) In relation to the Note of Consultation that was made of the consultation that took place on the 14th June 1996 (Re: Strain Inquest, Ref: 122-001-001-6), we would also be grateful if you could provide information on the following:

(a) Do you have any recollection of this consultation or of the case of Adam Strain? If so please provide details;

NO RECOLLECTION OF CONSULTATION OR CASE

(b) Was an Agenda provided in relation to this consultation?

No

(c) Were you in attendance at this consultation?

I ASSUME FROM THE NOTES THAT I WAS IN ATTENDANCE

(d) If so, in what capacity were you present at the consultation?

WOULD HAVE BEEN THERE TO TAKE NOTES

(e) Was the Note (Ref: 122-001-001-6) taken by you?

AS NOT HANDWRITTEN, I CANNOT GUARANTEE THAT IT IS MINE, BUT I ASSUME IT IS MY NOTE

(f) If so, who asked you to take this Note and why?

I WOULD HAVE BEEN ASKED TO DO THIS BY
MR GEORGE BRANGAM

(g) Please identify the person referred to as "GMcC" at the foot of the Note ("HN/GMcC")?

THIS IS A TYPING REFERENCE
THE FIRST INITIALS ARE MINE, FOLLOWED BY THE TYPIST
WHOSE NAME, I THINK, IS GAIL MCCLELLAND

(h) Did anyone else take a note of this consultation?

NO RECOLLECTION OF THIS SPECIFICALLY, BUT USUALLY
ONLY I WOULD TAKE NOTES

(i) If so who else took a note?

(ii) What, as far as you are aware, became of such notes?

(i) Is this Note entirely your own note or an amalgamation of other notes taken by others present at the consultation?

IT WOULD HAVE BEEN JUST MY NOTES

(i) If the Note is an amalgamation of other notes, who else provided a note?

(ii) What became of that notes(s)?

(j) Would you have taken an initial note of this meeting in handwritten form and if so:

yes

(i) Do you still retain those initial notes?

No

(ii) If not, please explain what became of them or where they may be retained?

IF THEY ARE NOT ON THE FILE, USUALLY AS I DICTATED FOR TYPING, WOULD HAVE SCORED THROUGH THE RELEVANT PARTS AND ONCE TYPED, WOULD HAVE DESTROYED THE HANDWRITTEN NOTES

(k) Would it have been your practice to type up the Note after the conclusion of such a meeting? If so, did you do the same in respect of this consultation?

WOULD GENERALLY DICTATE THE NOTES

(l) Would anyone have reviewed / provided further comment on the Note before it took final form? If so, please provide details of who would have been likely to have reviewed / provided such comment?

No - JUST A TYPED VERSION OF MY NOTES

(m) Was the Note ever dated and signed?

No RECOLLECTION

(n) Would this Note have been circulated to the attendees or anyone else? If so:

No RECOLLECTION, BUT PROBABLY NOT - USUALLY
JUST NOTES KEPT IN OFFICE

(i) For what purpose was it circulated?

(ii) What response was received?

(o) Are you aware of outcome of this consultation and whether there was any follow up or further correspondence in relation to it?

No

(p) Are you aware of any other meetings which occurred during this period in relation to the case of Adam Strain?

No

(q) The Inquiry has been informed that a number of consultations took place. Please provide any further information you may have in relation to the meetings which took place on the following dates:

(i) 17th April 1996; No RECOLLECTION

(ii) 28th May 1996; No RECOLLECTION

(iii) 31st May 1996; No RECOLLECTION

(iv) 5th June 1996; No RECOLLECTION

(v) 14th June 1996.

THERE ARE NOTES OF AN INSPECTION OF EQUIPMENT
ON 14.6.1996 WHICH APPEAR TO BE MINE

(r) Were you present at any of these consultations? If so, did you take a Note of the same?

AS ABOVE

(s) Are you aware of, or have any further information in relation to, these or any other consultations which might have taken place in relation to the case of Adam Strain?

No

(3) In relation to the Notes of Inspection of Equipment (Re: Adam Strain, Ref:122-001-007-8) we would be very grateful if you could confirm the following:

(a) Did you also take this Note?

AS NOT HANDWRITTEN, I CANNOT GUARANTEE THIS,
BUT IT APPEARS TO BE MY NOTE

(b) If so, who was in attendance at this consultation?

MR GEORGE BRANGAM, AT LEAST ONE REPRESENTATIVE
FROM THE TRUST AND MYSELF

(c) Who asked you to take this Note and for what purpose?

MR GEORGE BRANGAM WOULD HAVE ASKED FOR THIS -
AGAIN FOR USE WITHIN THE OFFICE

(d) Was it signed off/ approved and if so by whom?

No

(e) Please provide any further information you may have in relation to this Note.

I DO HAVE A VAGUE RECOLLECTION OF THIS
INSPECTION OF EQUIPMENT, JUST BECAUSE IT WAS
DIFFICULT TO UNDERSTAND THE FLUID CONCENTRATIONS

- (4) Did you attend the Inquest of Adam Strain on 18th June 1996? If so, with whom and for what purpose?

I DO NOT SPECIFICALLY REMEMBER THIS, BUT AS THESE ARE MY HAND-WRITTEN NOTES, I MUST HAVE ATTENDED. MY ROLE WOULD HAVE BEEN TO TAKE NOTES.

- (5) Did you take the handwritten notes of the Inquest (Ref: 122-044-003-051)? If so, on the instruction of whom? If not are you aware of who did?

YES. WOULD HAVE BEEN AT THE REQUEST OF MR G BRANHAM

- (6) Are you aware of what the office practice was in relation to the keeping of any files in the case of Adam Strain?

NOT SPECIFICALLY

- (7) What happened to these files once they were closed?

CLOSED, COMPLETED FILES WERE SENT TO AN OFF-SITE STORAGE FACILITY

- (8) Did the Police ever contact you in relation to the case of Adam Strain?

No

- (9) Is there any reason why you may have cause to remember the case of Adam Strain?

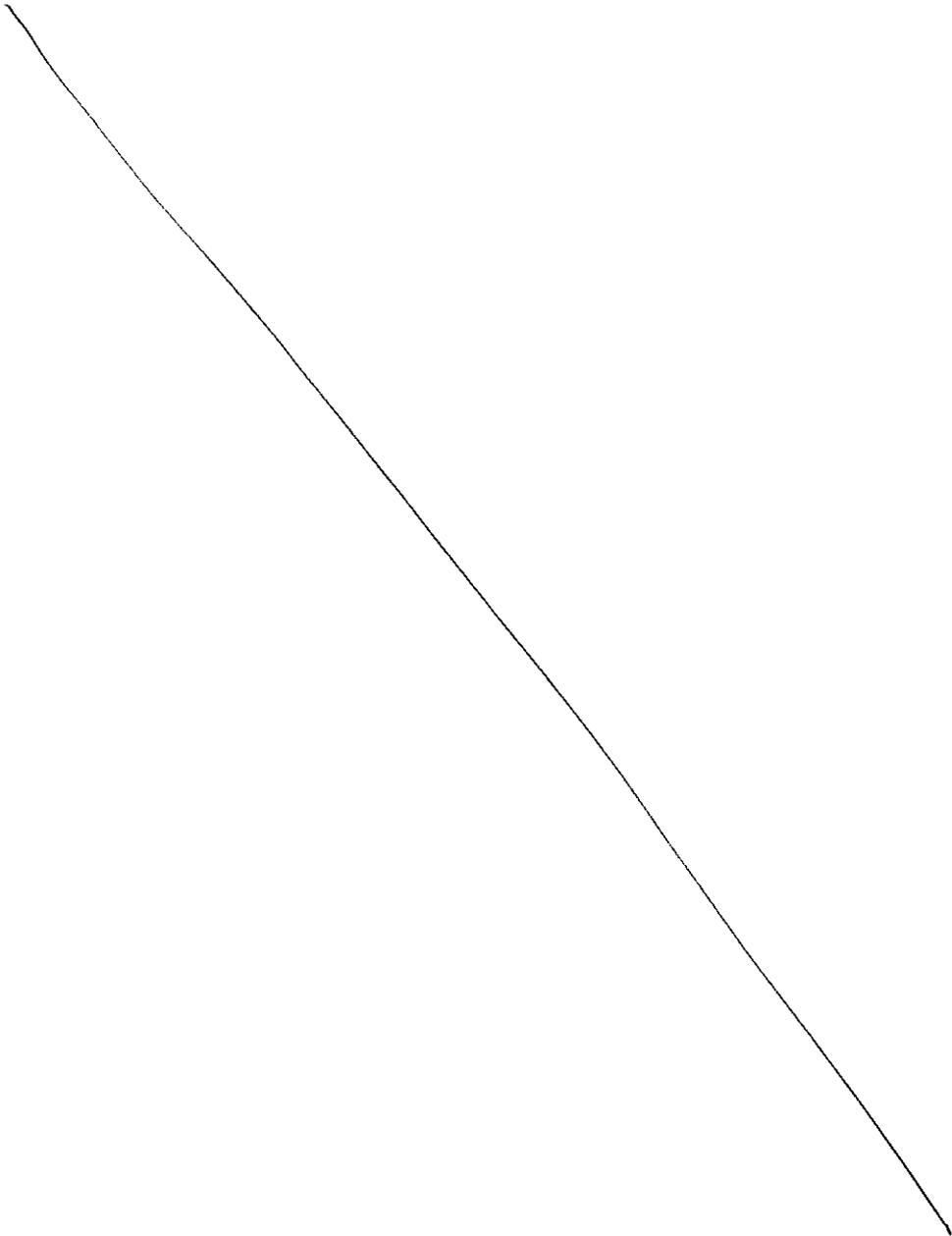
No

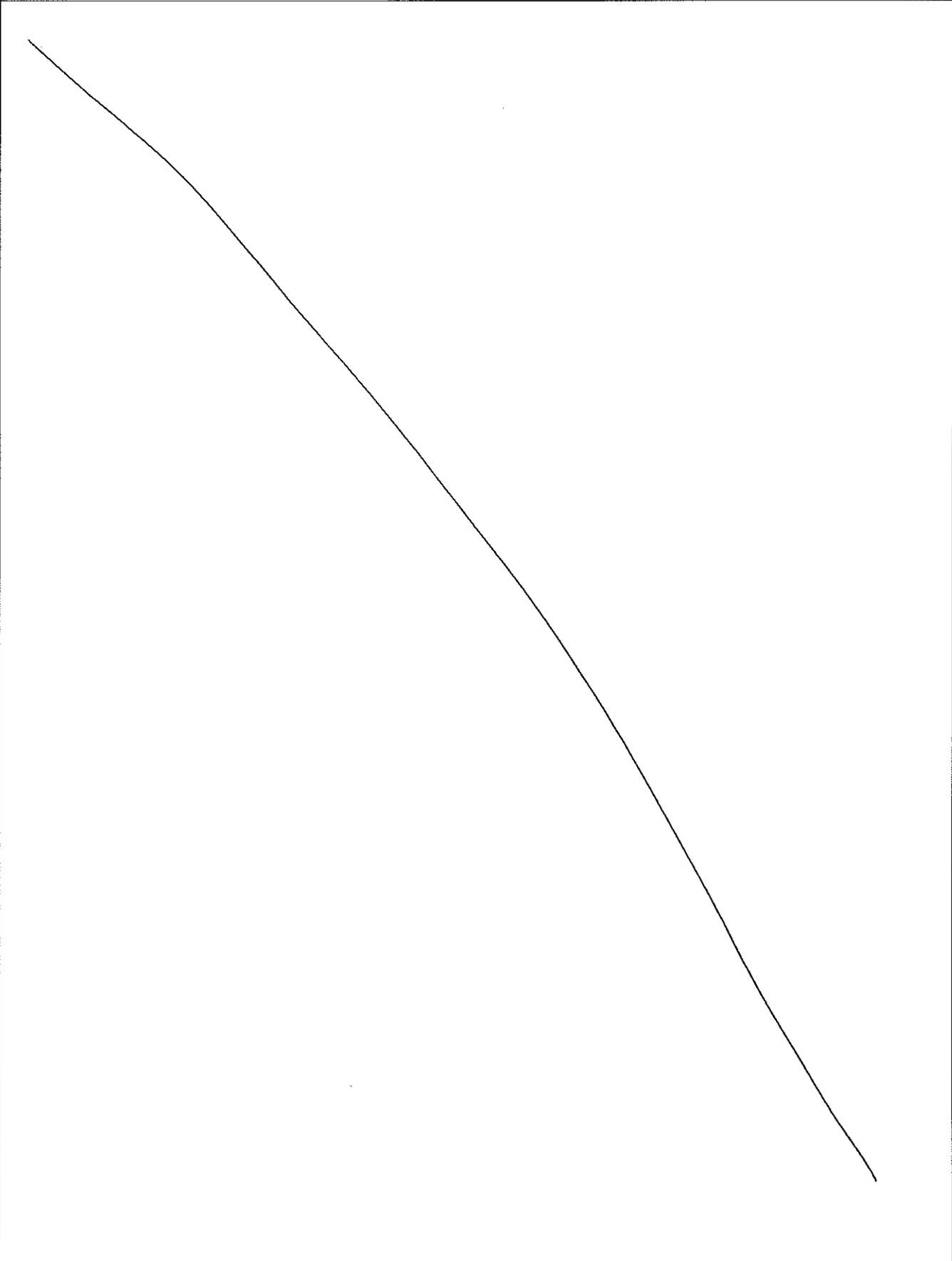
III. GENERAL

(10) Please provide any further comments you may wish to make, and anything else you know about the case of Adam Strain.

NO FURTHER COMMENTS

NO FURTHER RECOLLECTIONS ABOUT THE CASE





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

Signed: *Heather Neill*

Dated: 9-7-12