

Witness Name: Bernard Manson

Statement No: WITN3092033

Exhibits:

Dated: 9 June 2021

INFECTED BLOOD INQUIRY

SECOND WRITTEN STATEMENT OF BERNARD MANSON

I provide this statement in response to a request under Rule 9 of the Inquiry Rules 2006 dated 20 May 2021.

I, Bernard Manson, will say as follows: -

Section 1: Introduction

Please provide your date of birth, address, occupation and employment history

1. GRO-C 1955.
2. GRO-C London, GRO-C
3. I would want my address and exact date of birth redacted from the public record.
4. Career Summary from my CV:

2018 to now	Number Champions (Educational charity) <i>Chair, Acting CEO (unpaid)</i>
2011 to 2018	Ablon Ltd (Consultants) <i>Consultant for various business clients</i>
2006 to 2011	Santander Bank Plc

	<i>Business Development Manager, UK Corporate Banking</i>
2003 to 2006	Ablon LLP (Consultants) <i>Consultant for various business clients</i>
1993 to 2003	Barclays Bank PLC <i>Divisional Finance Director in Investment and Retail banks.</i>
1991 to 1993	Bernard Manson Associates (Consultants) <i>Consultant for various business clients</i>
1985 to 1991	Chase Manhattan Bank, N.A. <i>Vice President in Risk Management</i>
1984 to 1985	T & ACS Ltd (Software house) <i>Project manager</i>
1983 to 1984	Nikuv Ltd (Software house) <i>Analyst/programmer</i>
1978 to 1982	Harlow & Jones Ltd (Metal traders) <i>From graduate trainee progressed to Assistant to Finance Director</i>

Section 2: Responses to criticism of W3988

5. The request from the Inquiry refers to a redacted witness statement which the request states contains the criticism.
6. I note that the request is unclear in several places, and I refer to the text of the statement as necessary to clarify the relevant points.

7. Unfortunately, the statement is also unclear in places, particularly regarding the dates it refers to but also in places regarding the actual meaning intended. I have tried to explain carefully where I have had to make assumptions about meanings.
8. As background to my answers, it should be noted that the witness was a trustee of the Haemophilia Society from January 2011 until June 2014. She was thus part of the board which approved my nomination as chair and she also took part in the discussion on and approval of the Society's policy on contaminated blood and its development of a new statement of strategy in 2012. Later on she approved the appointment of Liz Carroll as CEO. She would also throughout the period have had the opportunity to make her opinions known to the board.

"No knowledge of haemophilia" page 49, paragraph 9

9. The witness states that I had no knowledge of haemophilia and contaminated blood. This was broadly true when I took office in November 2011 (as approved at the time by the witness), but as shown extensively in my witness statement dated 13 May 2021 and spanning 110 pages, I had made myself reasonably knowledgeable in the first few months of my term of office and continued so thereafter. The witness would have been directly aware of this from her observing my involvement in board discussions which covered all relevant areas of the Society's work, including both treatment and contaminated blood.
10. Any person in a professional role is expected to learn aspects of the role "on the job", and these aspects are often important and complex. I certainly could not match the empathy of someone who themselves had haemophilia or had a family member with haemophilia, but this is scarcely the subject matter of "professional criticism".
11. I would add that it was made clear at my interview for the role of Chair that the then board, including the witness, wanted someone from outside the haemophilia community so as to bring a fresh approach to the Society.

The "Irish Model" page 49, paragraph 9

12. The request states that the witness felt it was "unfortunate" I did not support the "Irish model". This is not true, as I was and am a great admirer of how the Irish Haemophilia Society was run and what it achieved. However, it was not possible

simply to duplicate in the UK the structure of the Irish Haemophilia Society (including the sociology and history of people with haemophilia in Ireland), and it was even less possible to make the UK government duplicate the constructive approach of the Irish government which underpinned the success of the Irish Society.

13. As examples of the "Irish model" the statement quotes "contacting all the Haemophilia Centres, contacting all the known members, setting up local groups".
14. The strategy review, which I established from the first Board meeting I ran in January 2012 and was concluded in the first half of 2012, defined a strategy which included contacting all the UK Haemophilia Comprehensive Care Centres (i.e. the 26 or so largest Centres out of about 65) and reinvigorating existing local groups and establishing the creation of new ones. We made good progress on this especially after Liz Carroll became CEO. It was not practical to contact personally all of our more than four thousand members, and this was therefore not a part of the strategy.
15. It is thus clear that, far from not supporting the "Irish model", I was instrumental in incorporating in the Society's strategy the features of it which the witness deems most salient. As a board member at the time, the witness would have been aware of this.

"Opposing registration of a Scottish Charity" page 49, paragraph 10

16. The request states that the witness "was told" that I was opposing registration of a Scottish charity. The statement states more coherently that Susan [Warren] told her that "the Scottish Management Committee were trying to register as an independent charity and ... [this] was being prevented by Bernard Manson and [a staff member]".
17. It is unclear what time this alleged opposition is meant to have taken place.
18. If it was meant to be when the Scottish Management Committee was still a part of the Haemophilia Society (ie before October 2012) then if the Committee had tried to reconstitute itself as an independent charity without the agreement of the Society it would have been a totally illegitimate act – as if the managers of the Scottish branch of a UK company had tried to register it as an independent company in Scotland. I, and any staff member, would of course have opposed any such attempt as part of

our professional responsibilities. However, I am unaware that any such attempt was contemplated.

19. If, as is more likely, the witness is referring to the time after the Scottish Management Committee resigned en masse in late 2012 to establish a separate Scottish charity, I and the Haemophilia Society took no action to interfere with their creation of this. In fact we performed a positive role in enabling them to use the name "Haemophilia Scotland" which was previously a name used by the Society and which they could not have used without our permission.

"Lobbying" page 49, paragraph 10

20. The witness claims that the Society would not lobby Westminster MPs. This is not true. For example, it is directly contradicted by large parts of my first witness statement to the Inquiry dated 13th May 2021 where I discuss our work with the All Party Parliamentary Group (APPG).
21. The witness also claims that the Society would not lobby "Scottish" MPs - I assume this refers to MSPs rather than Scottish MPs at Westminster whom we lobbied as we did for all MPs. The Society's approach to this is evidence of professional competence rather than otherwise. We did not lobby members of the Scottish Parliament from London - this would have been counterproductive given the political atmosphere in Scotland. Before the members of our Scottish Management Committee resigned, they lobbied the Scottish Parliament on behalf of the Society from a Scottish base. Subsequently, we tried to collaborate with the new Haemophilia Scotland on lobbying; for example, in responding to the Penrose Report in 2015, they focused on the Scottish Parliament and we on the UK parliament. It was and presumably still is difficult for a UK charity to engage the Scottish Parliament directly.

Section 3: Other Issues

22. I address here all the other points in the witness statement ("the statement") which could be construed as critical of me but are not referenced in the request and certain other points in the statement which are not directly critical of me but which are implicitly critical of the way in which the Society as whole was run.

23. Paragraphs 1 to 4 relate to events before I became Chair of the Society.
24. Paragraph 5 states: "The Board consisted of a Resources Committee and they held separate meetings. This was where the Society's direction was decided."
25. This is incoherent, but it is clarified in paragraph 11 which states "there was a Resources Committee consisting of Board members who made the decisions about the Board's direction. The Resources Committee always met prior to the Trustee's [sic] meeting."
26. It is untrue that the Resources Committee "made the decisions about the Board's direction." The Resources Committee looked only at (i) the finances of the Society and (ii) confidential staff matters, and all of its decisions were reported to the full board and could be overruled. As relevant examples, the Society's strategy and the contaminated blood Policy were discussed only at the board and not at the Resources Committee.
27. Paragraph 5 also states "I felt that the board ... didn't seem to have any interest in or had given up on contaminated blood." It is unclear to what time period this refers. At my first board meeting, in November 2011, I announced that I wanted the Society to establish a policy on contaminated blood, and this policy was discussed at every board meeting from January to September 2012 when it was agreed. (And possibly at the October 2012 meeting to agree minor changes.) The witness would have been at all of these meetings, or if absent would have received the papers in advance and the minutes afterwards. As repeatedly discussed and agreed by the board of which the witness was a member, this was part of a strategy to have a coherent policy framework to engage government and others, working through the APPG as our primary channel for lobbying. My statement describes at length the Society's active involvement with the APPG during my tenure.
28. It is therefore untrue that at any time during my tenure the board had "no interest or had given up" on contaminated blood.
29. Paragraph 6 makes the extremely serious accusation that the Haemophilia Society would not campaign on contaminated blood because it received £100,000 [a year for 5 years] from the Department of Health following the Archer Inquiry. I can state categorically that the Society during my tenure did not take any action or refrain from any action because of this payment, **and indeed it had no incentive to do so as**

the payment was unconditional. As is clear from my first statement and this second statement in the paragraphs immediately above as well as from the contemporaneous minutes, during the first year of my tenure the Society produced and publicised a policy on contaminated blood which was very critical of the DoH and the Government, and throughout my tenure it pursued actions through the APPG meetings and elsewhere which were critical of the DoH.

30. Again the witness would have been aware of all of this at the time.
31. Paragraph 9 talks about the staff restructuring of the Haemophilia Society. Again the witness was aware of the underlying reasons for the restructuring and took part in and agreed the board decision making. She is entitled to her current opinion, but her implied criticism of the process does not reflect the discussion and agreed conclusions at the time.
32. Paragraph 12 makes a serious and unsubstantiated allegation that “Chris James’ job was made unbearable.” Had this been the case, Chris, who was well versed in HR matters, had the knowledge and capability to complain or to go to a tribunal, which he did not do. As noted above, detailed discussions of staff matters took place at the Resources Committee and were reported in summary to the board, so that the witness had the opportunity at the time to raise the issue if she thought we were mismanaging Chris, which to my memory she did not. Ultimately, 20 months after I joined, Chris resigned to take a job in a much larger charity which was as least as senior as his CEO role and was better suited to his skill set and temperament.
33. Paragraph 13 makes allegations against Liz Carroll that are contradicted by the achievements of the Society under Liz’s leadership from January 2014 to my departure in November 2015. The witness also alleges that Kate Khair “decided the direction” of the Society’s interaction with the contaminated blood community; this is simply untrue. Kate had a very minor role in this area. Throughout the time that the witness was on the board, at least 5 of the (up to) 11 board members either had been infected through contaminated blood or had immediate relatives who had died from contaminated blood, and it simply would not have been possible for any other trustee to dominate the decision making on the topic.
34. There are no other issues which I consider will be relevant to the Inquiry’s investigation of the matters set out in its Terms of Reference beyond those already included in my original witness statement.

Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed

GRO-C

Dated 9th June 2021