

Witness Name: Madelaine Warburton

Statement No: WITN 4193 001

Exhibits: None

Dated: 11 March 2020

INFECTED BLOOD INQUIRY

WRITTEN STATEMENT OF MADELAINE WARBURTON

ON BEHALF OF THE LIVERPOOL UNIVERSITY HOSPITALS NHS FOUNDATION TRUST

I, MADELAINE WARBURTON, Director of Corporate Governance for Liverpool University Hospitals NHS Foundation Trust, will say as follows: -

1. I make this statement in response to a Rule 9 request received by the Liverpool University Hospitals NHS Foundation Trust ("LUHFT") dated 13 February 2020, which was addressed to the LUHFT Chief Executive, Steve Warburton ("the second Rule 9 request").
2. It follows a previous Rule 9 request that had been sent to Aidan Kehoe as the Chief Executive of the Royal Liverpool and Broadgreen University Hospitals NHS Trust ("the Royal") dated 20 August 2018 ("the first Rule 9 request"). The first Rule 9 request sought production of documents and information held by the Roald Dahl Haemostasis and Thrombosis Centre (that was part of the Royal and now forms part of LUHFT) which were potentially relevant to this Inquiry's terms of reference. The first Rule 9 request also asked that documents and information held or controlled by the Roald Dahl Haemostasis and Thrombosis Centre were preserved and not destroyed whilst the Inquiry is ongoing. A copy of the first Rule 9 request was sent on behalf of the Chief Executive to the Clinical Haematology

management team. A copy was also sent to the Deputy Director of Information and Patient Access Services, who has responsibility for the Trust's Records Management Policy.

3. In October 2019, the Royal came together with another NHS organisation (the Aintree University Hospital NHS Foundation Trust) to create LUHFT. Subsequently, in the second Rule 9 request, LUHFT was asked to provide a statement by a person with appropriate knowledge, experience and seniority to explain the searches and steps undertaken by the Royal following the first Rule 9 request. I have been chosen to fulfil this task.
4. By way of background, I have held my current role of Director of Corporate Governance for LUHFT since its establishment in October 2019. Prior to that date, I was the Associate Director of Corporate Affairs for the Royal. I had held that position since 2012.
5. I shall now turn to the specific queries raised by the second Rule 9 request.
6. I have made enquiries with relevant staff within LUHFT and I confirm that, in order to comply with the first Rule 9 request, the following searches were undertaken:
 - a. Within the Clinical Haematology department, the Clinical Haematology team made enquiries of all of their clinical and administrative/clerical staff to identify any, and all, locations of documentation held by the team that may be relevant to the Inquiry. For clarity, the search incorporated all the physical area comprising the Roald Dahl Haemostasis and Thrombosis Centre and other areas occupied by Clinical Haematology department. All such Clinical Haematology locations were then physically reviewed by the Haematology Deputy General Manager, with support from a clinical team comprising a Consultant and Senior Specialist Nurse for any information that fell within the scope of the Inquiry. The Haematology shared network drives (known as the "Haemophilia" and "Haematology" network) were reviewed for any documentation relating to the terms of the Inquiry. Members of clinical and administrative/clerical haematology staff were each asked to review any other documentation that they held, if not already reviewed, for information relevant to the Inquiry, such as within

individual Consultant offices. Each member of staff subsequently confirmed that they had reviewed all documentation held.

- b. The Haematology Laboratory and Haematology Laboratory Store records were reviewed manually by the Haematology Deputy General Manager, to identify any documents within the Inquiry's scope.
 - c. An electronic search was undertaken on the Royal's network executive team drive which includes documentation held by the executive team members, past and present, from the year 2000 to the present time using the words/phases "haemophilia", "blood inquiry" and "infected blood". The search was overseen by the Deputy Trust Secretary on my behalf.
 - d. Board agendas and papers from 1991 to present day have been manually searched by the Deputy Trust Secretary. This included a systematic physical search of boxes stored in the Trust's Corporate Records Library, Grain Industrial Estate, Liverpool relating to the period 1991 - 2005.
 - e. Confirmation has been provided by a member of the Estates Department, who has worked in the Trust for 33 years, and in the Estates Department for 16 years, that all locations that could potentially hold any papers or files relevant to the infected blood enquiry on the Trust sites have been systematically searched.
7. For the avoidance of doubt, the first Rule 9 request confirmed that individual patient records were not required and so relevant medical records were stored securely but not shared with the Inquiry at that time. LUHFT continues to securely hold historical/deceased Haemophilia case notes and records for current patients should they be required.
8. LUHFT is (and the Royal as its predecessor organisation was) able to deposit and archive information at the Liverpool Central Library and Record Office. However, to my knowledge of both organisations and from enquiries and discussions with both Royal/LUHFT staff neither the Royal nor LUHFT has used that facility for archiving records. This is likely to be because the Royal (and now LUHFT) has had the physical space to store and archive its own documentation since the Royal was established in April 1995 by the Royal Liverpool and Broadgreen University Hospitals National Health Service Trust (Establishment)

Order 1994 and that position has continued since the establishment of LUHFT in 2019. I am not aware, either from my own knowledge or from enquiries and discussions internally and externally, that there are any other information repositories available to either the Royal or LUHFT.

9. All corporate and Clinical Haematology documentation (which encompasses all records relating to the Roald Dahl Haemostasis and Thrombosis Centre) held by both the Royal and LUHFT were searched for anything falling within the Inquiry's terms of reference as set out at paragraph 6 of my statement above. Indeed, because the Royal (and now LUHFT) also holds corporate documentation from the former Royal Liverpool University Hospital National Health Service Trust (which was established in December 1990 by the Royal Liverpool University Hospital National Health Service Trust (Establishment) Order 1990), that documentation was also included in the searches carried out in response to the first Rule 9 request too, as set out in paragraph 6d of my statement above.

10. LUHFT (and its predecessor organisation the Royal) has control, responsibility and oversight of the Trust's Corporate Records Library located at the Grain Industrial Estate, Toxteth. The facility was established in 2017/18 to provide a centralised facility for the storage of the Royal's corporate records alongside paper health records. This repository was searched in response to the first Rule 9 request as set out in paragraph 6d of my statement above.

11. Since the first Rule 9 request, the Centre has not destroyed any information or documentation that it holds as required by that request.

Statement of Truth

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

Signed GRO-C

Dated 11. March 2020