

Witness Name: ERICA SAUNDERS

Statement No.: WITN4194001

Exhibits: WITN4194002-005

Dated: 3rd August 2020

INFECTED BLOOD INQUIRY

WRITTEN STATEMENT OF ERICA SAUNDERS

I make this statement in response to the written request dated 17 February 2020 from the Solicitor to the Inquiry pursuant to Rule 9(1), 9(2) and 9(4) of the Inquiry Rules 2006.

I, Erica Saunders, will say as follows: -

Section 1: Introduction

I am the Director of Corporate Affairs for Alder Hey Children's NHS Foundation Trust. I took up this role in September 2010. I began my NHS career in 1991 through the national graduate management training scheme and spent over ten years working in primary care and commissioning roles before moving to the acute sector in 2003. Prior to joining Alder Hey, I was Director of Corporate Affairs at the Liverpool Women's NHS Foundation Trust where I directed the successful application to become the first foundation trust in Merseyside. I have an MBA as well as a BA (Hons) degree from the University of Liverpool.

My current remit includes the role of Trust Secretary, advising and supporting the Chair, Board of Directors and Council of Governors on all aspects of regulation and corporate governance.

I wish to make clear both my own and Alder Hey Children's Hospital NHS Foundation Trust's wish to assist the Inquiry to meet its terms of reference. I would also wish to confirm our commitment to candour, openness and transparency and to assisting the

Inquiry as far as possible.

Given the extent and scope of the information requested by the Inquiry I have received considerable assistance in making the necessary enquiries in order to be able to respond to the request. I have relied upon individuals employed by and/or working for Alder Hey Children's Hospital.

The information I provide in this statement is true and accurate to the best of my knowledge and belief and is based upon my own personal knowledge and responses to the enquiries that have been made.

My response is as follows:

1. Of the searches undertaken to comply with the Rule 9 request of 15 August 2018 please provide a list of the searches, including search terms used.

On receipt of the request, addressed to the Chief Executive Louise Shepherd, she asked me to coordinate the response on behalf of the Trust. The request was on the basis that the Liverpool Paediatric Haemophilia Centre was within the Trust's structure and sought all information and documents held by the Trust in any form (paper, electronic, audio, video, microfiche etc) excluding individual patient records that were potentially relevant to the issues set out in the Inquiry's Terms of Reference.

To collate the Trust's response I convened a meeting of relevant personnel, including the Trust pathology and haematology lead consultants and our haematology nurse specialist which took place on 11th September 2018. This led to our initial response by the then Medical Director Dr Steve Ryan which explained that many documents had been destroyed under the relevant policies when we moved into our new premises in 2015, but that after receipt of the request from Dame Lowell Goddard as chair of the Independent Inquiry into Child Sexual Abuse (IICSA) to retain all documents, we have not destroyed any records held centrally by the Trust. Following the Risk Assessment sent via IICSA from NHS England this decision was reinforced and cascaded throughout the Trust not to destroy but to hold all records in their original format until further instructions are received.

Alder Hey Children's NHS Foundation Trust has an off-site archiving agreement with

Uniscope. Uniscope is currently the sole provider of such services. On receipt of the request in response to our initial reply, we identified the paper archive stored off-site at Uniscope and provided to the Inquiry a spreadsheet which detailed the paper records held which included:

- Blood product orders
- Blood product movement records
- Blood Stock records
- Fridge records
- Lab testing records for Blood Groups and Crossmatches
- Blood Bank registers

We also advised the outcome of a clinical case notes review we had conducted.

The Inquiry responded by requesting copies of the documents held at Uniscope. In response I convened a further series of meetings with relevant personnel, including the Laboratory Manager Ray Billington who had worked at the Trust and its predecessor NHS bodies since June 1988 and was best placed to understand what the archived documents were likely to be, whether they were relevant and the systems involved. Ray Billington identified the records which were likely to be relevant, or might be, to the Terms of reference. We notified the Inquiry of those documents and proposed that we recall the documents several boxes at a time and held them in a secure room for review and scanning. We invited the inquiry team to attend to review them and that review ultimately took place on 7th January 2020. Copies of the documents identified as relevant in that review were provided to the Inquiry.

I also emailed relevant colleagues on 1st October 2018, specifically those involved in the working group, which included the senior Consultant Haematologist, Specialist Haematology Nurse, Clinical Director of Pathology, Divisional Director of Medicine, General Manager for Medicine and Haematology Service Manager, asking specifically if anyone thought we held any other information.

2. A list of all the Alder Hey Children's Hospital NHS Foundation Trust repositories (from 1950 to present day), such as local authorities, university archives and the National Archives for which the Trust had or has any control, responsibility or oversight.

As far as I am aware, the Uniscope archive is the only off-site place at which records are now held. In relation to the historic position, back to 1950, I am not able to comment. Dr Ryan set out the history as we understand it, together with the position with documents in our original response and I am not able to add to that, having continued to make enquiries as far as I am able in response to each further request by the Inquiry. Where we were not able to produce documents, we have set out information as to processes based on the recollection of long-serving haematology clinicians and the laboratory manager.

3. With reference to 2, a list of the repositories and archives searched in response to the Rule 9(2) request dated 15 August 2018.

I am not aware of any such archive.

4. If the records that were requested in the Rule 9(2) request dated 15 August 2018 have been destroyed in line with Alder Hey Children's Hospital NHS Foundation Trust's document retention and destruction, please provide copies of the relevant document destruction record or policy as exhibits to this statement.

I have set out already that when we were making plans to move into the new hospital facility in 2015 we were under an imperative to dispose of any historic information which we were no longer required to retain. This also fits with good information governance and data minimisation as now encapsulated in the General Data Protection Regulations and Data Protection Act 2018. I attach documents relevant to that process, which were in place at the time:

- Information Lifecycle and Records Management Policy
- Retention Schedules – Health Records
- Standard Operating Procedure for Retention of Records held by the Trust
- Transferring Records - advice leaflet issued to staff preparing for the move to the new hospital.

Statement of Truth

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

Signed _____

GRO-C

Dated ____ 3rd August 2020 _____

Table of exhibits:

Date	Notes/ Description	Exhibit number
April 2015	Information Lifecycle and Records Management Policy	
	Retention Schedules – Health Records	
August 2014	Standard Operating Procedure for Retention of Records held by the Trust	
July 2014	Transferring Records - advice leaflet issued to staff preparing for the move to the new hospital.	