

ADDENDUM TO WRITTEN STATEMENT OF WILLIAM VINEALL AND LORRAINE JACKSON

Witness Name: W. Vineall, L.  
Jackson.

Statement No.: WITN7193070

Exhibits: None

Dated: 26/10/2022

INFECTED BLOOD INQUIRY

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ADDENDUM TO WRITTEN STATEMENT OF WILLIAM  
VINEALL AND LORRAINE JACKSON

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We, William Vineall and Lorraine Jackson, will say as follows:

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## Section 0: Introduction

We draft this addendum statement further to the statement served on 20 September 2022.

## Section 1: Eight documents withheld from public domain

1.1. We were asked by the Inquiry to specify which of the documents over which the Department of Health claimed Public Interest Immunity in the HIV Litigation were thought to have been destroyed at any time prior to the announcement of the Infected Blood Inquiry in 2017.

1.2. At paragraph 1.30 of our first statement, we addressed this:

*“But by February 2009, the DH was reviewing the justification for withholding this material, given the time that had elapsed. By 16 March 2009, an email from Ms Laura Kennedy to Mike De Silva proposed withholding 8 of the 35 documents only [ DHSC5081107]. On or by 20 April 2009, the DH released 27 of the remaining 35 documents, after they were redacted [DHSC5568876].”*

1.3. At the time of giving our statement, we did not have these 8 documents and advised in our statement that we would continue to search for them:

*“We understand that the IBI has asked for these 8 documents to be identified, but to date this has not been possible. We will continue to seek these documents.”*

1.4. We have subsequently been informed that these documents had already been provided to the Inquiry by another witness prior to our rule 9 request and are now in the public domain and we therefore draft this addendum to reflect this position.

1.5. The following table outlines the eight documents in question:

**Table 1 – Eight documents withheld from public domain**

<b>No.</b>	<b>URN</b>	<b>Description</b>	<b>Section withheld under</b>
1.	WITN5494038	Curriculum Vitae of Michael John Harvey	s 40 Personal Information
2.	WITN5494039	List of the membership of Joint Management Committee for the Central Blood Laboratories and the CVs of Stanley Arthur Hibbert, Arthur R. Lockwood, and E. Kenneth Samways	s 40 Personal Information
3.	WITN5494040	CV summaries of company representatives at a meeting with MS(H) including Robert A Schoellhorn, Gerald J Mossinghoff, Sir Philip De Zulueta, David C Jones, and David Gibbons	s 40 Personal Information
4.	WITN5494042	HIV/Haemophiliac Litigation Certificate completed by Christopher Walter France dated 23 July 1990	s 42 Legal Professional Privilege
5.	WITN5494044	Memo from D Burrage, Department of Health, to Mr Desai TSOL re: HIV Haemophilia Litigation, plaintiffs' summons dated 30 November 1990	s 42 Legal Professional Privilege

6.	WITN5494046	Patient medical record relating to a newly reported AIDS case of an unknown patient reported by Dr J Craske dated 6 September 1983	s 40 Personal Information
7.	WITN5494048	Letter to Dr Donald Acheson re: patient with Christmas disease dated 13 September 1985	s 40 Personal Information
8.	WITN5494050	Schedule 1: Documents referred to in discovered documents but not themselves separately listed	s 42 Legal Professional Privilege

Statement of Truth

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

Signed:

**GRO-C**

Dated: 26.10.2022

Signed:

**GRO-C**

Dated: 26.10.2022