Witness Name: Paula Baden

Statement No.: 1

Exhibits: PLB/01 and PLB/02

Dated:

## THIRLWALL INQUIRY

# WITNESS STATEMENT OF PAULA BADEN

- I, Paula Baden, will say as follows: -
- 1. My full name is Paula Louise Baden. I hold the following qualifications:
  - 1.1. Foundation degree Science in Integrated Practice (Early Years and Children), awarded a "PASS" in 2008 at Edgehill University;
  - 1.2. Bachelor of Science (Honours) in Children's Nursing, awarded First Class Honours in
    2011 at Edgehill University; and
  - 1.3. Postgraduate Certificate in Teaching in Higher Education in 2023.
- 2. Upon qualifying, I began my role as a Band 5 in St Marys Hospital, Manchester as a neonatal nurse looking after babies that required Special Care and High Dependency care.
- 3. I remained as staff nurse at Band 5 between 2011- 2021 working at a range of Hospitals (St Marys, Ormskirk, Alder Hey and Whiston) on their neonatal units until my current role as a Nurse Education Lecturer at Edgehill University began in June 2021.

## **Countess of Chester Hospital**

- 4. I cannot now recall exactly when I worked for Pulse Nursing agency, but it was from approximately 2012 until 2016. During this time, I was given 1 or 2 shifts as an agency nurse on the neonatal unit at the Countess of Chester Hospital in 2015 2016. Due to the lapse of time, I do not remember how many shifts I did in total, but I do know I did a shift at the Countess of Chester Hospital on 16 December 2015 as I have seen the notes I made on that date. My role was to care for the babies assigned to my care which would been High Dependency babies or babies requiring Special Care. I cannot recall the exact time a night shift was, but it is usually around 8pm 07.30am. These shifts were the only occasions that I worked at the Countess of Chester that I recall.
- 5. I only actually remember working one shift at the Countess of Chester Hospital. As such, I am unable to comment on that Hospital's culture, atmosphere, management, or supervision. I am also unable to comment on relationships between different staff and

WORK\51553951\v.1

- managers at the Countess of Chester Hospital between June 2015 and June 2016. I was not a member of their staff and have minimal memory around these issues at the Countess of Chester Hospital between June 2015 and June 2016.
- 6. I had previously been employed full time on the Alder Hey Childrens Hospital's neonatal unit and, from memory, I was working at Alder Hey during the time that I did my shift at the Countess of Chester Hospital. As Alder Hey is a surgical unit, it is very different to a Special Care Baby Unit, as it specialises in babies that need various types of surgery. I cannot compare the Countess' culture and the Countess' working relationships between staff and managers with that of Alder Hey as I do only remember working that one particular shift as an agency nurse.
- 7. I do not recall hearing any comments or reports on the quality of care, the quality of the management, supervision and/or support of nurses, or the nature of the relationships between different staff and managers at the Countess of Chester Hospital's neonatal unit between June 2015 and June 2016.

#### Child J

- 8. I have reviewed my previous statements dated 9 July 2018 [INQ0001125] and 3 May 2019 [INQ0001126], which are attached as my Exhibits PLB/01 and PLB/02. I confirm that these statements remain accurate.
- 9. In relation to Child J, as stated in my statement to the police, I did recall her from her prior admission to Alder Hey Children's Hospital. I also remembered her parents. As an experienced surgical nurse, I recall I may have offered to look after her as she had a stoma, which I was competent to look after. In regard to the quality of her care at the Countess of Chester Hospital, the only thing I recall is being more confident and experienced at changing her stoma bag. I then reported a mark that I saw as explained in my statement to the police. I am not able to comment on differences in care between Alder Hey and the Countess; I was only at the Countess of Chester Hospital for a short time and, in addition, as I mentioned above the clinical services offered by both hospitals is very different; Alder Hey's neonatal unit is a surgical unit whilst Countess' neonatal unit is a medical unit.

#### Concerns

- 10. As an agency nurse, I was not given any training by the Countess of Chester Hospital on how to report concerns about fellow members of staff that I can recall.
- 11. I do not recall working with Lucy Letby or have any memory of her or anyone having suspicions or concerns about her.

12. I was not aware of an increase in the deaths on the neonatal unit at the time. I only became aware of that when I was subsequently contacted by the police as part of their investigation.

## Reflections

- 13. On consideration, in my opinion, monitoring babies by CCTV may have been a deterrent that could have prevented the crimes of Letby. However, we must consider the impact on families. Also, the special care ward is an environment where parents and their babies are forming a bond, establishing feeding and caring. Monitoring via CCTV could impact on that and be considered as an invasion of their privacy,
- 14. I have been asked what recommendations the Inquiry should make to keep babies in neonatal units safe from the criminal actions of staff. In my view:
  - 14.1. Parents should have more and better equipped facilities to enable a parent to stay at the bedside throughout their baby's stay.
  - 14.2. Whilst I am unsure of the procedures around neonatal deaths and reporting, I feel that if there is more than one, regardless of reason, this should have a thorough investigation.
  - 14.3. Medication must always be kept securely and regular medication audits should also be carried out to identify any anomalies.
- 15. I do not have any documents or other information which is potentially relevant to the Inquiry's Terms of Reference.

### Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

| Signed: | Personal Data |
|---------|---------------|
| Dated:  | 26/3/24.      |