

## 12 September 2016

92. On 12 September 2016, I asked Maxine Wright, who was a member of the Trust's HR team at the time, to send me a copy of the Trust's grievance policy (**INQ0102212\_0001**). I expect I asked her to do this because I was aware that the Trust's policy appended various template letters which should be used when managing grievances.
93. I responded to Sue later that day, providing her with a draft acknowledgment letter, which was based on the Trust's template letter in the grievance policy (**INQ0002971\_0001**). I provided advice to Sue in relation to the steps that she should take in relation to continuing to manage the concerns that had been raised by Letby and her welfare officer regarding her ongoing redeployment, in the context of managing the risk of a constructive unfair dismissal claim which had been threatened and appeared to be increasingly likely.
94. On 12 September I emailed Sue to suggest that a separate file should be set up (**INQ0102247\_0001**). It appears that most advice was being recorded to the general employment advice file because of the sporadic nature of instructions we were receiving, at that time. I expect that I would have decided to open a new file because it was apparent that this matter would require ongoing employment advice relating to the grievance investigation and any potential future employment tribunal proceedings.
95. It appears that a new file was set up, noting an attendance note at **INQ0102268\_0001** is recorded to that file. As far as I recall, the new file was an extension of the ongoing advice provided, which had been recorded to the general advice file. Corinne continued to have responsibility for advising in relation to the regulatory aspects of the matter and I expect, but cannot confirm, that file continued to be used by DACB for recording advice, leading up to and following my departure from the firm. I did not give any further advice regarding matters arising in the external review, but I did give advice, as addressed below.

## 26 October 2016

96. I note from an attendance note at **INQ0102271\_0001** that I received a call from Sue Hodgkinson on 26 October 2016. She explained that the second external (forensic) review had been completed, and this had criticised the Trust for "*not going down the full process based on the allegations that had been raised*" and for "*not telling Lucy [about] the comments and allegations that had been raised at the time*".
97. Although I cannot recall the conversation, and have not received a copy of the report to date, in the context of the second criticism regarding not telling Letby about the allegations that had been raised "*at the time*", my reading of the attendance note is that criticism relating to "*not going down the full process*" may relate to actions which were not taken by