

13. *Did Dr Watt receive monetary rewards for performing Epidural Blood Patch Treatment?*

Under Freedom of Information this would be exempt under Section 40 part (1) – Personal Information. This is an absolute exemption and does not require a public interest test.

14. *What restrictions did the Trust impose on Dr Watt? On what date were these restrictions imposed? What was the basis of these restrictions?*

Concerns were initially raised in December 2016. The Trust immediately took steps to restrict Dr Watt's practice in the areas of his practice where concerns were identified to be substantiated. Dr Watt was fully restricted from clinical duties from July 2017.

15. *Did Dr Watt have access to patient's clinical files whilst he was under investigation, both internally and externally?*

Since the end of June 2017 when Dr Watt was not treating patients he did not require access to patients' clinical files for clinical purposes. He may, however have been required to access patients' clinical files to support the consultant appraisal process. This would have been for reference purposes only.

16. *Who was responsible for conducting Dr Watt's appraisals? Please provide details as to why no appraisal was conducted for the period 2014-2017 on Dr Watt's practice?*

While there was a delay in Dr Watt completing his 2014 and 2015 annual appraisals, his appraisals are now all up-to-date. It would be important to highlight that any concerns regarding the conduct, health or performance of doctors are managed as they arise, and are not dependent upon an appraisal meeting for either their identification or management.

17. *Were any of Dr Watt's patients "red flagged"?*

No. This is not a terminology used by Belfast Trust Neurology Services.

18. *How was the Emergency Department instructed to handle Blood Patch patients who presented to A&E?*

The Emergency Department was not instructed to handle blood patch patients who presented to A&E. If advice is required for any patient presenting with neurological symptoms, the Emergency Department contact the Neurology Registrar on call.

19. *How many Blood Patch patients have presented to A&E for related or unrelated medical issues since 2014?*

74 patients

20. *What is the "early alert system" that the Trust used to send notification of Blood Patch patients? Who received these alerts? What action was taken?*

The early alert system is a process whereby Trusts communicate incidents or potential incidents to the Department of Health, advising what actions have or will be taken. The system was not specifically used to notify the Department of Health in relation to blood patch patients.

21. *How many patients have been diagnosed with a functional condition within the last ten years?*

This information is not held.

A patient may present with symptoms which appear to be caused by problems in the nervous system but which are not caused by a physical neurological disease. They are 'medically unexplained'. The symptom could fall within several chapters of classification.

22. *How many Blood Patch patients have been diagnosed as "functional"?*

Outcomes are not yet known.

23. *How many Blood Patch patients required treatment in ICU?*

Nil

24. *Have any Blood Patch patients died after receiving this treatment?*

Nil

25. *List all external or awarding bodies that the Trust reported concerns too, from the period February 2016-2018. List all the external or awarding bodies that the Trust reported concerns too post February 2018. Please provide all correspondence.*

Belfast Trust contacted: the Department of Health, HSC Board, General Medical Council, Public Health Authority, Royal College of Physicians and the National Clinical Assessment Service (NCAS).

Regarding correspondence: In accordance with the Freedom of Information Act 2000 information is exempt under Section 36 – Prejudice to the effective conduct of public affairs. Disclosure of information would prejudice the effective conduct of public affairs.

26. *What gauge of needle was used for performing Epidural Blood Patching on each patient?*

This information is not available.

27. *What technique was used for conducting Blood Patch treatment on patients?*
Patients would be asked to lie down during the procedure.

28. *Please provide a list of training on Blood Patching that Dr Watt or any other health professional has undergone.*

As per response to question 4, this information is not known. There is no specific qualification or training available for epidural blood patch treatment.

29. *Please provide a serious incident report, year on year for the past ten years.*

The following figures do not solely relate to Neurology Services but are Belfast Trust-wide.

Reporting Period	Total Number of Serious Adverse Incidents (SAIs)
1 April 2017 to 31 March 2018	86
1 April 2016 to 31 March 2017	89*
1 April 2015 to 31 March 2016	157**
1 April 2014 to 31 March 2015	182
1 April 2013 to 31 March 2014	104
1 April 2012 to 31 March 2013	95
1 April 2011 to 31 March 2012	92
1 April 2010 to 31 March 2011	60
1 April 2009 to 31 March 2010	54
1 April 2008 to 31 March 2009	15

*No. of SAIs excluding criterion 2 – any death of a child in receipt of HSC services

**58 SAIs relate to the criterion of reporting any death of a child in receipt of HSC services as SAIs.

30. *How many Dr Watt patients were reported as serious incidents in the past ten years up to August 2018? Please provide details.*

Prior to 2018 there was one SAI. In 2018 there was another; and one interface*.

*In line with HSCB procedures, any organisation alerted to an incident which it feels has the potential to be a SAI should report the incident to the HSCB using the Interface Incident Notification form.

31. Please provide a breakdown of Neurology Department budget year on year for the past ten years, including salaries and bonuses.

Neurology Budget Breakdown – for all staff

Year	Total Budget	Goods & Services Element	Salaries & Wages Element
	£'000	£'000	£'000
2008-09	13,169	7,944	5,225
2009-10	14,488	8,993	5,495
2010-11	14,520	9,347	5,173
2011-12	15,616	10,344	5,271
2012-13	17,469	12,355	5,114
2013-14	17,661	12,170	5,491
2014-15	18,914	13,468	5,445
2015-16	22,713	16,531	6,182
2016-17	25,386	18,899	6,487
2017-18	27,038	20,278	6,760

There were zero bonuses paid throughout.

32. Please provide a breakdown of Neurology admissions to hospital, year on year for the past ten years.

Year (1 Jan – 31 Dec)	Admissions
2008	791
2009	653
2010	683
2011	665
2012	760
2013	777
2014	790
2015	771
2016	636
2017	664

33. Please provide a detailed list of legal costs year on year for the past ten years. Please provide a detailed breakdown.

This information is held by the HSC NI Business Services Organisation Legal Services Directorate. Accounts are included in the Organisation Annual Reports:

<http://www.hscbusiness.hscni.net/about/CorporateInformation.htm>

34. *Please provide a detailed list of third party consultancy costs, year on year for the past ten years.*

The HSC Leadership Centre provides a range of services to HSC organisations including consultancy services. Consultancy services include leadership development programmes, support for improvement, team development and other support, including investigations.

The HSC Leadership provides services to HSC bodies who all pay the Centre directly for services. In relation to service provided to Belfast Trust, HSC Leadership Centre staff have provided a range of services which the Trust has paid for.

For further information please visit: <http://leadership.hscni.net/AboutUs/Index>

35. *Please provide Board expense reports year on year for the past ten years.*

These are included in Belfast Trust Annual Reports which are publically available here: <http://www.belfasttrust.hscni.net/about/Publications.htm>

36. *Please outline the function of the Rapid Access Neurology Clinic?*

Urgent referrals are made to the Rapid Access Neurology Clinic from the Emergency Department to ensure that patients are seen by a consultant neurologist within seven days.

37. *Please provide a detailed report of RANC, including: costs and diagnosis.*

The annual RANC clinic costs are £140,000. The main diagnoses of patients referred to the clinic are epilepsy and headaches.

38. *Define Dr Mark Cross role within the Trust and the function of his clinic.*

Dr Mark Cross is an Acute Medical Consultant and he has a General Medical Outpatient Clinic.

PublicLiaison-SM

From: [REDACTED]
Sent: 04 January 2019 14:43
To: [REDACTED]
Subject: RE: FOI Enquiry - 18622

Dear [REDACTED]

In response to your questions:

Firstly, we agreed on the extended timeframe on the basis that all questions would be answered in full. This has not been done.

Belfast Trust has answered all questions as fully as possible.

As explained in our cover letter: There are a number of questions that we are unable to answer at this time. There is an independent QC panel-led Inquiry on-going which will address many of these issues. In accordance with the Freedom of Information Act 2000, information is exempt under Section 36 – Prejudice the effective conduct of public affairs. This means that to disclose this information would prejudice the effective conduct of public affairs, and in this case, we mean the Inquiry.

Secondly, a cover letter does not appropriately explain why the majority of questions and subsequent answers are missing. Please can you outline what exemptions you feel apply for each individual question?

All questions have been answered apart from the first five originally submitted. These are exempt under Section 36. In our response of 21 December 2018, an answer is provided for each individual question.

Thirdly, the cover letter exemption given does not apply and therefore you must still provide the information requested. As you know, even if it did apply, the information must still be disclosed unless you are saying that it is not in the public interest?

As explained in our cover letter: There are a number of question that we are unable to answer at this time. There is an independent QC panel-led Inquiry on-going which will address many of these issues. In accordance with the Freedom of Information Act 2000, information is exempt under Section 36 – Prejudice the effective conduct of public affairs. This means that to disclose this information would prejudice the effective conduct of public affairs. In applying Section 36 Belfast Trust has carried out a Public Interest Test and it was not considered in the public interest to release the information requested for the reasons previously explained.

I am sorry you feel you have not had fulsome answers to your request. If you are dissatisfied with the way in which your Freedom of Information (FOI) request has been handled you may wish to complain. Full details of how to do this were included in your response but for your ease, you should contact [REDACTED] Nore Villa, Knockbracken Health Care Park, Saintfield Road, Belfast BT8 8BH or alternatively e-mail: [REDACTED] within two months of the date of this response and your complaint will be considered and a response provided usually within 20 working days of receipt.

Should you still be dissatisfied with the outcome, you can proceed to the second review stage by contacting the Information Commissioner, The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF who will undertake an independent review. It is important to note that if you refer any matter to the Information Commissioner, you will need to show evidence of having gone through the Trust's review process to try to resolve the matter with the Trust in the first instance.

[Ends]

I do hope you find this information helpful


Many thanks

[REDACTED]


Belfast Health and Social Care Trust


E: [REDACTED]

T: [REDACTED]

 belfasttrust.hscni.net

 facebook.com/BelfastTrust

 twitter.com/BelfastTrust

 youtube.com/BelfastTrust



Respect | Partnership | Experience & Skill | Leading edge | Learning & development | Accountability

From: [REDACTED]

Sent: 21 December 2018 12:50

To: [REDACTED]

Subject: Re: FOI Enquiry - 18622

Hi [REDACTED]

Thanks for this however there are some major concerns on how this FOI has been handled.

Firstly, we agreed on the extended timeframe on the basis that all questions would be answered in full. This has not been done.

Secondly, a cover letter does not appropriately explain why the majority of questions and subsequent answers are missing. Please can you outline what exemptions you feel apply for each individual question?

Thirdly, the cover letter exemption given does not apply and therefore you must still provide the information requested. As you know, even if it did apply, the information must still be disclosed unless you are saying that it is not in the public interest?

Please clarify your position please.

Thanks,

[REDACTED]

From: [REDACTED]
Sent: 18 April 2019 13:45
To: [REDACTED]
Cc: geraldine.quinn@neurologyinquiry.org.uk; Watson, Peter
Subject: Neurology Recall FOIs
Attachments: Letter to DLS BHSCT re NITSIP comments regarding FOI requests 060319.PDF;
Attached Image

Dear [REDACTED]

We at the Belfast Trust have received correspondence (see attached) from the Independent Neurology Inquiry.

Upon reviewing our correspondence with NITSIP, we have noted that the last correspondence was that issued to Ms Hanna dated 21 December 2018, a copy of which is attached for your convenience. That correspondence was sent, further to the Trust seeking the advice of the Information Commissioner's Office. We have received no response from Ms Hanna to that correspondence.

Should you or your colleagues at NITSIP wish to make a response to our correspondence of 21 December 2018, we at Belfast Trust will of course consider that response and take all appropriate action.

I trust that this clarifies the position at this time, but should you have any further queries, please do not hesitate to contact me.

I am copying this email to Mrs Quinn at the Independent Neurology Inquiry, for her information also.

Yours sincerely,

[REDACTED]

[REDACTED]

Public Liaison Service
Belfast Health and Social Care Trust

E: [REDACTED]

T: [REDACTED]



belfasttrust.hscni.net



[facebook.com/BelfastTrust](https://www.facebook.com/BelfastTrust)



twitter.com/BelfastTrust



[youtube.com/BelfastTrust](https://www.youtube.com/BelfastTrust)



Health & Social Care | Community & Public Health | Learning & Development | Equality & Diversity

INDEPENDENT NEUROLOGY INQUIRY

Belfast Health and Social Care Trust
Trust Headquarter, A Floor
Belfast City Hospital

Our ref: GQ-0075-19

Date: 06 March 2019

C/o Directorate of Legal Services

Dear Sirs,

RE Independent Neurology Inquiry

The Inquiry has received correspondence from [REDACTED] on behalf of the Northern Ireland Trust Services Improvement Panel (NITSIP) which states the following:

'The Belfast Trust refuses to answer many FOI's on the basis that this Inquiry is ongoing which further complicates our ability to provide support to neurology patients.'

The Inquiry has not provided comment in this regard, however consent has been obtained from NITSIP to share their comments with the Belfast Trust to ensure that you are aware.

Please provide any response to NITSIP at contact@nitsip.org for the attention of [REDACTED] with whom a copy of this letter has been shared.

Yours sincerely,



Geraldine Quinn
Secretary to the Inquiry

21 December 2018

Our ref: FOI/19161

[REDACTED]

Dear [REDACTED]

RE: Neurology Services Recall

I refer to your Freedom of Information (FOI) request received 16 November 2018.

Belfast Trust considers that the cost of retrieving the information would be above the 'Appropriate Limit' as defined by the Freedom of Information Act 2000 under Section 12. Section 12 of the Freedom of Information Act makes provision for public authorities to refuse requests for information where the cost of dealing with them would exceed the appropriate limit. The limit has been specified as £450 for public authorities such as Belfast Trust. This represents the cost of one or more person spending 18 hours in determining whether we hold the information, locating, retrieving and extracting this information.

As per our correspondence of 23 November 2018, should you wish to revise your request and re-submit a question(s) we would be happy to look at this again.

If you are dissatisfied with the way in which your Freedom of Information (FOI) request has been handled you may wish to complain. You should contact [REDACTED] Nore Villa, Knockbracken Health Care Park, Saintfield Road, Belfast BT8 8BH or alternatively e-mail: [REDACTED] within two months of the date of this response and your complaint will be considered and a response provided usually within 20 working days of receipt.

Should you still be dissatisfied with the outcome, you can proceed to the second review stage by contacting the Information Commissioner, The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF who will undertake an independent review. It is important to note that if you refer any matter to the Information Commissioner, you will need to show evidence of having gone through the Trust's review process to try to resolve the matter with the Trust in the first instance.

If you require any further information or wish to discuss, please do not hesitate to contact me.

Yours sincerely

[REDACTED]

[REDACTED]

PublicLiaison-SM

From: Mike Nesbitt <mike@mikenesbitt.co.uk>
Sent: 27 September 2018 09:31
To: PublicLiaison-SM
Subject: Freedom of Information Request

I request all paperwork relating to Dr Michael Watt and his annual assessments while employed by the Belfast Health and Social Care Trust.

Best wishes

Mike Nesbitt
MLA for Strangford
Ulster Unionist Leader 2012 - 2017
mike@mikenesbitt.co.uk
www.uup.org
[@mikenesbittni](#)





Belfast Health and
Social Care Trust

caring supporting improving together

Public Liaison Services
Belfast Health and Social Care Trust
1st Floor, Nore Villa
Knockbracken Healthcare Park
Saintfield Road
Belfast BT8 8BH

T: (028) 9504 5888
F: (028) 9056 5553
E: publicliaison@belfasttrust.hscni.net

18 October 2018

Our ref: FOI/18784

Mike Nesbitt MLA
Constituency Office
16 South Street
Newtownards
BT23 4JT

Dear Mr Nesbitt

RE: Dr Michael Watt

I refer to your Freedom of Information (FOI) request received 27 September 2018. Please find below the details you requested. I hope this information is helpful.

This request does not fall under the terms of the Freedom of Information Act 2000. Under Freedom of Information this would be exempt under Section 40 part (1) – Personal Information. This is an absolute exemption and does not require a public interest test.

If you are dissatisfied with the way in which your Freedom of Information (FOI) request has been handled you may wish to complain. You should contact [redacted] Nore Villa, Knockbracken Health Care Park, Saintfield Road, Belfast BT8 8BH or alternatively e-mail: edel.osullivan@belfasttrust.hscni.net within two months of the date of this response and your complaint will be considered and a response provided usually within 20 working days of receipt.

Should you still be dissatisfied with the outcome, you can proceed to the second review stage by contacting the Information Commissioner, The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF who will undertake an independent review. It is important to note that if you refer any matter to the Information Commissioner, you will need to show evidence of having gone through the Trust's review process to try to resolve the matter with the Trust in the first instance.

If you require any further information or wish to discuss, please do not hesitate to contact me.

Yours sincerely

[redacted signature]



PublicLiaison-SM

From: [REDACTED]
Sent: 30 September 2018 13:24
To: PublicLiaison-SM
Subject: Freedom of Information request - re Blood patches

Dear Belfast Health and Social Care Trust (Northern Ireland),

how many patients were sent letters advising of blood patch review?

how many patients did Dr Watt have on his list waiting for blood patches?

following your internal review, how many of these patients no longer required blood patching procedure?

on average, how many blood patches per month did Dr Watt perform?

how many of these were done under correct theatre guidelines?

Yours faithfully,

[REDACTED]

Please use this email address for all replies to this request:

[REDACTED]

Is publicliaison@belfasttrust.hscni.net the wrong address for Freedom of Information requests to Belfast Health and Social Care Trust (Northern Ireland)? If so, please contact us using this form:
https://www.whatdotheyknow.com/change_request/new?body=belfast_health_and_social_care_trust_northern_ireland

Disclaimer: This message and any reply that you make will be published on the internet. Our privacy and copyright policies:
<https://www.whatdotheyknow.com/help/officers>

For more detailed guidance on safely disclosing information, read the latest advice from the ICO:
<https://www.whatdotheyknow.com/help/ico-guidance-for-authorities>

Please note that in some cases publication of requests and responses will be delayed.

If you find this service useful as an FOI officer, please ask your web manager to link to us from your organisation's FOI page.



Belfast Health and
Social Care Trust

Public Liaison Services
Belfast Health and Social Care Trust
1st Floor, Nore Villa
Knockbracken Healthcare Park
Saintfield Road
Belfast BT8 8BH

T: (028) 9504 5888
F: (028) 9056 5553
E: publicliaison@belfasttrust.hscni.net

8 November 2018

Our ref: FOI/18793

Dear [REDACTED]

Re: Blood patches

I refer to your Freedom of Information (FOI) request received 30 September 2018.

- 1. How many patients were sent letters advising of blood patch review?**
There were 81 letters sent.
- 2. How many patients did Dr Watt have on his list waiting for blood patches?**
There were 101 patients on the waiting list for a blood patch.
- 3. Following your internal review, how many of these patients no longer required blood patching procedure?**
The Trust is currently collating the outcomes for the first phase of the patient recall and is therefore unable to predict details in this regard.
- 4. On average, how many blood patches per month did Dr Watt perform?**
The average per month during the year 2016-2017 was 10 blood patches.
- 5. How many of these were done under correct theatre guidelines?**
It would not be appropriate for the Trust to comment on this in advance of the investigation which is underway in the Trust

If you are dissatisfied with the way in which your FOI request has been handled you may wish to complain. You should contact: [REDACTED]

[REDACTED] Nore Villa, Knockbracken Health Care Park, Saintfield Road, Belfast BT8 8BH or alternatively e-mail: [REDACTED] within two months of the date of this response and your complaint will be considered and a response provided usually within 20 working days of receipt.

Should you still be dissatisfied with the outcome, you can proceed to the second review stage by contacting the Information Commissioner, The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF who will undertake an independent review. It is important to note that if you refer any matter to the Information Commissioner, you will need to show evidence of having gone through the Trust's review process to try to resolve the matter with the Trust in the first instance.

If you have any queries regarding this letter please do not hesitate to contact me.

Yours sincerely

A solid black rectangular box used to redact the signature of the sender.

PublicLiaison-SM

From: [REDACTED]
Sent: 25 October 2018 12:45
To: [REDACTED]

Follow Up Flag: Follow up
Flag Status: Completed

Hi [REDACTED]

Hope you are well. Do you have a list of all 8 current investigations regarding Neurology Recall and the terms of reference for each?

Thanks,

--

Patient Support Group
NITSIP
Northern Ireland Trust Services
Improvement Panel
contact@nitsip.org

Disclaimer

The contents of this e-mail are confidential to the intended recipient and may be legally privileged. It must not be disclosed to or used by anyone other than the intended recipient. If you are not the intended recipient. You should not read, disseminate, distribute, copy or otherwise use it. If received in error please delete it from your system. Please note that NITSIP do not accept any responsibility for any malicious programs contained within this transmission as it is your responsibility to scan the e-mail and any attachments. Any form of electronic communication cannot be guaranteed to be secure as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. NITSIP do not accept responsibility or liability for any subsequent alterations to the contents of this e-mail which arise as a result of e-mail transmission after it was sent. The opinions expressed in this email are the senders own and they do not necessarily represent NITSIP.



Belfast Health and
Social Care Trust

caring supporting improving together

Public Liaison Services
Belfast Health and Social Care Trust
1st Floor, Nore Villa
Knockbracken Healthcare Park
Saintfield Road
Belfast BT8 8BH

T: (028) 9504 5888
F: (028) 9056 5553
E: publicliaison@belfasttrust.hscni.net

19 November 2018

Our ref: FOI/18968

[REDACTED]

Dear [REDACTED]

RE: Terms of Reference for Belfast Trust Neurology Inquiry

I refer to your Freedom of Information (FOI) request received 25 October 2018.
Please find below the details you requested. I hope this information is helpful.

This information is exempt from disclosure under the Freedom of Information Act
Section 30 - Investigations and proceedings conducted by public authorities.

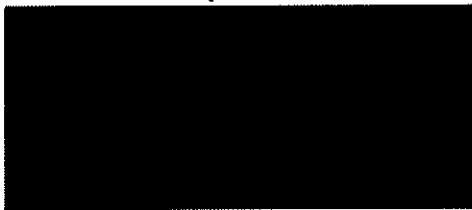
At the outset this investigation, which is the internal investigation undertaken by the Trust as employer, into the concerns raised regarding Dr Watt, its employee, will be confidential. This investigation is conducted within the 'Framework of Maintaining High Professional Standards in the Modern HPSS', which framework must be used in the consideration of any and all concerns regarding doctors employed at the Trust. While Belfast Trust has previously been clear that there would be internal consideration of the concerns, as an internal investigation it is not appropriate for Belfast Trust to make public its Terms of Reference.

If you are dissatisfied with the way in which your Freedom of Information (FOI) request has been handled you may wish to complain. You should contact [REDACTED] Nore Villa, Knockbracken Health Care Park, Saintfield Road, Belfast BT8 8BH or alternatively e-mail: [REDACTED] within two months of the date of this response and your complaint will be considered and a response provided usually within 20 working days of receipt.

Should you still be dissatisfied with the outcome, you can proceed to the second review stage by contacting the Information Commissioner, The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF who will undertake an independent review. It is important to note that if you refer any matter to the Information Commissioner, you will need to show evidence of having gone through the Trust's review process to try to resolve the matter with the Trust in the first instance.

If you require any further information or wish to discuss, please do not hesitate to contact me.

Yours sincerely



PublicLiaison-SM

From: [REDACTED]
Sent: 16 November 2018 13:53
To: [REDACTED]
Subject: FOI
Attachments: HSCT FOI.docx

Follow Up Flag: Follow up
Flag Status: Completed

H [REDACTED]

We have been waiting on the original FOI response so that further questions can be clarified if needed.
Please find attached further FOIs.

Thanking you in advance,

Please provide a breakdown of "never events" that have been recorded in the past 10 years. Has any of Dr Watts patients been recorded as never events? Please include patients from the Recall process including those in the new 1044 recall process.

Please advise how each Trust meets the National Safety Standards for invasive procedures? When was this introduced in each trust? Who signed this off?

Please advise how Dr Watt met the standards for blood patching.

How many recall patients are recorded as did not attend (dna) or could not attend (cna) for their neurologist appointment? Further to this, their treatment/tests including psychology? How many of each group rebooked?

Please advise how many recall patients were referred to neuropsychology. How many were referred for possible FND? How many of those patients cancelled or did not attend?

Please provide mental health guidelines for all frontline staff. Is all staff trained?

Please provide details of Neurology training in Emergency Departments. Is all staff trained?

Who governs Emergency Departments? How is governance maintained? Please list all governing bodies.

Who governs Invasive and surgical procedures? How is governance maintained? Please list all governing bodies.

Who governs psychology services? How is governance maintained? Please list all governing bodies.

Please provide a breakdown of each Trusts marketing costs, including salaries and bonuses for Past 5 years.

Please advise what criteria is used to confirm a somatic symptom disorder? What criteria is used to confirm a Functional diagnosis?

Please provide all complaints/concerns raised against all Neurologists in the past 10 years. Please provide a separate list of complaints raised for recall Neurologists.

Please list up to date costs of the neurology recall process?

How many blood patches did Dr Watt perform year on year for the past 10 years? How many of these were performed in theatre?

How many patients were referred to the RCP? On how many occasions? Please provide a breakdown of each illness/disease/procedures for each of these patients?

Please provide details of all additional training undertaken by all neurologists and costs associated with this training. Please provide same for any seminars or offsite events.

Page 2 of 5

Please outline the function of the research team including the software used (ie SPSS) Please provide all reports from the research team over the past 7 years.

Please provide all research and white papers contributed by any members of Neurology, Neuropsychology, Neurophysiology and Neuroradiology in the past 10 years. Please include staff who are no longer employed by the Trust.

Please provide copies of all correspondence to and from Dr Schievink of Cedar Sinai- please include costs involved for his services.

Please advise which patients should be referred to RANC? Who makes this decision? How many blood patch patients were referred through RANC? How is the safety of these patients assured by Emergency Departments to allow them to leave Hospital?

Please provide details of the directorate of legal services expenses over the past 5 years.

Please provide details of the purpose and function of the incident control team. Please provide all reports from this team over the past 5 years.

Please provide minutes from the board, GAC and BSO meetings over the past 5 years. Please also provide a copy of all reports discussed at these meetings including reports produced after these meetings.

Please provide details of any ongoing legal disputes.

Please provide details of Fellowship Programs within Neurology over the past 5 years. Please provide details as to how many neurologists currently employed by the Trust, trained under Dr Watt?

Please provide all Learned lessons reports in the last 10 years.

What is the Role of BSO in the Patient Recall? Please provide details.

What is the role of Veritas in the recall process? What date were they employed?

Please provide all correspondence to the department of health in the past 5 years. Please include correspondence to Richard Pengelly

What was the Role of Mark Mitchelson in all investigations into Dr Watt? What was the role of Dr Craig and Dr McDonnell in these investigations.

What date were the GPs contacted to inform them of the blood patch procedures by Dr Watt? Please include telephone calls. If no record of telephone calls exists, please explain why?

Please provide correspondence from/to Dr McBride in the Past 5 years.

How many of Dr Watts patients have died, year on year for the past 10 years including cause of death.

Please provide a breakdown of all deaths of any blood patch patient under all neurologists in the past 10 years. The deaths did not have to be a direct result or believed direct result of the blood patches, however, if you could indicate those believed to be a direct result of the blood patch and how many received a blood patch procedure. Please also advise if any blood patch patient over the past 10 years has ever received care through ICU.

How were the first 2500 recall patients identified? How were those most at risk identified and by whom?

How many concerns/complaints were raised about Dr Watt by colleagues/peers or patients year on year for the past 10 years. Please outline the reason for these concerns.

What date did the GP raise initial concerns regarding blood patches? What date did the GP raise 2nd concerns and why did he raise concerns twice? What was the GPs concerns? Were any concerns or complaints raised after this? If so, by whom?

Please provide a detailed list of restrictions imposed on Dr Watt by the Trust and provide dates that these restrictions were implemented.

What date was Dr Watts general neurology last extended? By whom?

How was the safety of blood patch patients ensured? What direction was given to GPs and Emergency Department staff? What direction was given to general medicine and neurology staff when blood patch patients presented?

What date was Dr Watt removed from clinical duties and why was this decision made in June? Did Dr Watt have access to patients records during the time of his internal investigations? Please confirm if Dr Watt has been suspended? Has Dr Watt ever been suspended? Is Dr Watt on full pay?

What date was Dr Watts first and last blood patch?

What date did Dr Peukert begin the investigation into Dr Watt? Has Dr Peukert ever raised concerns about Dr Watt previously?

What date did the Trust contact first the Royal College of Physicians regarding Dr Watt and why? Who referred the Trust to the RCP? What date did the Trust send a wider selection of Dr Watts case files to the RCP? How many were sent? How many blood patch case files were sent.

Did the Trust contact any other awarding body from Jan 2015 to current date.

Please provide what prompted dr Watts removal from duties in June 17 when it was agreed that current restrictions ensured patient safety? Explain how safety was ensured?

Please explain why Cathy Jack reported publicly that Dr Watt was reported to the RCP for not having the level of note taking the Trust would like when you knew there were problems with blood patches?

How was Dr Watts technique deemed to be correct? Who investigated this technique and how?