

FAO: Anne Donnelly
Urology Services Inquiry
Bradford Court
1 Bradford Court
Belfast
BT8 6RB

Date:
31st January 2023

Dear Madam

Re: Dr Richard Wright

We refer to the two witness statements of Dr Richard Wright (the first dated 16 June 2022 in response to s.21 Notice No.27 of 2022 [WIT- to WIT-17900] and the second also dated 16 June 2022 in response to s.21 Notice No.43 of 2022 [WIT-18421 to WIT-18453]). We also refer to Dr Wright's recent consultation with Inquiry Counsel on 20 January 2023 and to his forthcoming evidence session on 1/2 February 2023.

As discussed at the said consultation, a number of errors in the statements of Dr Wright have come to our attention and we understand that Dr Wright will seek to correct these at the appropriate point at the start of his oral evidence on 1/2 February 2023.

In ease of the Inquiry, and as discussed at his recent consultation, we understand the errors that Dr Wright will seek to amend to be as follows (the Inquiry will note that many of the errors are the same mistake repeated several times):



Dr Wright's First Statement of 16 June 2022 – S.21 Notice No. 27 of 2022

1. WIT-17829 - The relevant S.21 Notice number is wrongly recorded as '27 of 2021' when it should be '27 of **2022**'.
2. WIT-17830 - Para 1.5 - The sentence '*I was not privy to the March 2016 meeting or letter at the time*' should be amended to '*I was not privy to the March 2016 meeting **but was, on 30 March 2016, sent a copy of the letter along with confirmation that Mr Mackle had met with Mr O'Brien and given him the letter (TRU-282022)***'.
3. WIT-17831 - Para 1.7 - The words in brackets that have been crossed out should be deleted: '~~(Previously Clinical Director but now Associate Medical Director)~~'.
4. WIT-17831 - Para 1.7 - The following words that have been crossed out should be deleted: '~~Mr Haynes was newly appointed as Surgical Associate Medical Director and had discovered ...~~'.
5. WIT-17840 - Para 7.3 - the words in brackets '(initially Mr Mackle and then Mr Haynes)' should be amended to '(initially Mr Mackle, **then Dr McAllister**, and then, **following a short gap**, Mr Haynes)'.
6. WIT-17841 - Para 8.1 - the words in brackets '(initially Mr Mackle and then Mr Haynes)' should be amended to '(initially Mr Mackle, **then Dr McAllister**, and then, **following a short gap**, Mr Haynes)'.
7. WIT-17872 - Para 46.2 - the words '... after that I supported Mr Haynes formally and informally ...' should be amended to '... after that I supported **Dr McAllister and then** Mr Haynes formally and informally ...'.
8. WIT-17848 - Para 17.3 - The last sentence, '*Between March 2016 and December 2016 ...*' should be amended to, '*Between March 2016 and December **2017** ...*'.
9. WIT-17850 - Para 20.1 - '*Autumn 2016*' should be amended to '***Autumn 2017***'.
10. WIT-17862 - Para 36.4 - '*September 2015*' should be amended to '***September 2016***'.
11. WIT-17863 - Para 37.1 - '*Autumn 2016*' should be amended to '***Autumn 2017***'.
12. WIT-17876 - Para 48.1(a) - This paragraph should have added to the start of it the following words in bold: '***Apart from the matters raised with me by Mrs Trouton and Mr Mackle in January 2016 which were the subject of a letter to Mr O'Brien in March 2016 (as detailed above at, e.g., paras 1.4 and 1.5), I was not aware ...***'.

13. WIT-17877 – Para 49.3 – The first reference to ‘September 2018’ should be amended to ‘February 2018’ and the second reference to ‘September 2018’ in brackets should be amended to ‘Autumn 2017’.
14. WIT-17879 – Para 52.3(vi) - The date of the meeting should be amended from ‘30th January 2016’ to ‘30th December 2016’.
15. WIT-17882 – Para 55.3 – The description of Mr Haynes in brackets should be amended from ‘(Associate Medical Director)’ to ‘(Clinical Director)’.
16. WIT-17884 – Para 56.4 - The date ‘30th January 2017’ should be changed to ‘30th December 2016’.
17. WIT-17884 – Para 56.6 - The date ‘30th January 2017’ should be changed to ‘30th December 2016’.
18. WIT-17886 – Para 58.1 - The date ‘30th January 2017’ should be changed to ‘30th December 2016’.
19. WIT-17891 - Section 64.2 - The date ‘30th January 2017’ should be changed to ‘30th December 2016’.
20. WIT-17894 – Para 67.4 – The reference to 2016 in the following sentence should be amended to **2017**: ‘I observed the interactions between my AMDs and I was convinced that this was beginning to yield dividends around Autumn 2016.’
21. WIT-17895 - Para 67.9 - The reference to autumn 2016 in the following section should be amended to autumn **2017**: ‘I believe that, by autumn 2016, we had made considerable progress in developing a well-informed, highly trained senior medical team within the Trust. They realised the significance of the findings in relation to Mr. O’Brien and had the confidence to escalate. Historically, this had not been the case in relation to the surgical team.’
22. WIT-17897 – Para 70.2 – The sentence that begins ‘I did appreciate the full implications...’ should be amended to ‘I did **not** appreciate the full implications ...’.

Please also note that we have identified an error in the question numbering in the body of Dr Wright’s first witness statement. The number of Question 4 appears somehow to have dropped off the statement so that the question numbers on the statement between questions 4 and 21 (inclusive) do not match those in the corresponding Section 21 Notice (see, in

particular, WIT-17816 vs. 17837 plus WIT-17818 vs. 17851). However, as the text of each question has been faithfully reproduced in the body of the witness statement ahead of each of Dr Wright's answers, we trust that this will not have caused any difficulty.

Dr Wright's Second Statement of 16 June 2022 – S.21 Notice No. 43 of 2022

1. WIT-18421 - The relevant S.21 Notice number is wrongly recorded as '43 of 2021' when it should be '43 of **2022**'.
2. WIT-18430 – Para 7.13 – The description of Mr Haynes in brackets should be amended from '(AMD)' to '**(CD)**'.
3. WIT-18430 – Para 7.14 – The description of Mr Haynes in brackets should be amended from '(Associate Medical Director)' to '**(Clinical Director)**'.
4. WIT-18432 – Para 9.1 – The description of Mr Haynes in brackets should be amended from '(Associate Medical Director)' to '**(initially Clinical Director, then Associate Medical Director)**'.
5. WIT-18433 – Para 10.2 – Delete the words '*when he became AMD for Surgery*'.
6. WIT-18436 – Para 13.1(i) – Delete the words '*(AMD Surgery, representing Acute Services)*'.
7. WIT-18442 – Para 18.1 - The description of Mr Haynes in brackets should be amended from '(Associate Medical Director, Surgery)' to '**(Clinical Director)**'.

Finally, we wish formally to repeat the apology that was offered in respect of the above errors at our recent consultation, in particular, we apologise for any inconvenience caused to the Inquiry as a result.

Yours Sincerely

Emmet Fox
Solicitor



Email: Personal Information redacted by USI

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