

Submissions

Ms Leonie RAVEN



Your ref:
Our ref: CSS/HEA027/5744/DZP
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Department of
Justice and Attorney-General

3 November 2005

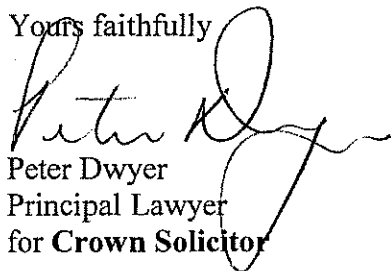
Mr David Groth
Secretary
Queensland Public Hospitals Commission of Inquiry
Level 9, Brisbane Magistrates Court
363 George Street
BRISBANE QLD 4000

Dear Mr Groth

Response on behalf of Leonie Raven

I **enclose** a response on behalf of Ms Leonie Raven, Queensland Health to the further submission of the Queensland Nurses' Union dated 1 November 2005. The response was drawn by Mr Farr of Counsel.

Yours faithfully



Peter Dwyer
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for **Crown Solicitor**

encl

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**RESPONSE ON BEHALF OF LEONIE RAVEN TO THE
QUEENSLAND NURSES' UNION SUBMISSION OF 1st NOVEMBER 2005**

1. Leave is sought to allow the acceptance of this further submission. It arises only as a result of a submission made on behalf of the Queensland Nurses Union (QNU) on 1st November 2005 which did not comply with the Commissioner's directions of 20th October 2005.
2. In "footnote 2" in the QNU's submission the general credibility of Ms Leonie Raven is attacked.
3. That attack did not comply with the Commissioner's directions in that it is not in any way responsive to an adverse submission from another party. This attack upon Ms Raven's credibility amounts to no more than gratuitous criticism which should be disregarded by the Commissioner due to:-
 - (a) that non-compliance; and
 - (b) its non specificity.
4. Furthermore, in paragraph 2(b) of that submission, the QNU argue that the evidence of Ms Raven is incorrect insofar as it relates to the non-downgrading of the Sentinel Event form regarding the death of Mr Bramich.

5. Such a submission is plainly wrong. The evidence of Ms Raven on this topic was:-
- she was not working at the time of this incident;
 - her subsequent inquiries revealed that the Adverse Event form and the Sentinel Event form, both of which related to Mr Bramich, were stapled together inadvertently;
 - the Sentinel Event form was nevertheless forwarded onto the District Manager and the Director of Medical Services as required, for their attention and action;
 - whilst the records generated by her unit failed to record the Sentinel Event form due to the earlier administrative error, the form was still actioned appropriately.
6. Such evidence is entirely consistent with the subsequent evidence of Mr Leck¹ and Dr Keating.²
7. It is submitted that the evidence of Ms Raven on this topic should be accepted.

¹ Statement of Leck, Exhibit 463, paragraph 31-41.
Evidence: T7167/50 - 7169/50; T7288/45 - 7289/36.

² Statement of Keating, Exhibit 448, paragraphs 132-160.
Evidence: T6998/10 - 7000/13.