

**OATHS ACT 1867**

**STATUTORY DECLARATION**

**SUPPLEMENTARY STATEMENT**

**QUEENSLAND**

**TO WIT**

I, **Lourdes Wong**, c/o Roberts & Kane Solicitors, level 4, 239 George St, Brisbane in the State of Queensland do solemnly and sincerely declare that:

The following supplementary statement is provided in response to correspondence from the Barrett Adolescent Centre Commission of Inquiry to Roberts & Kane Solicitors dated 20 January 2016 requiring me to provide a supplementary statement responding to additional questions.

The references to “questions’ are to those in the Notice to Provide a Written Statement dated 4 December 2015 previously issued to me.

**Response to Further Questions**

**Professional Experience**

**1. Further to questions 2 and 4:**

(a) **In your response to question 2, you refer to the After Hours Nurse Manager (AHNM). Was the AHNM a position that someone held either substantively or in an acting capacity, or was AHNM a role that someone was given each shift? If the position is the former, who held the position of AHNM in 2013 and January 2014?**

- i. The AHNM is a substantive position at The Park. This role provides for a nurse manager after hours, that is, on weekdays from 4:00 pm to 8:00am and on weekends. There is more than one person who undertakes this position.

Signed: .....  .....

- ii. The persons I dealt with in the role of AHNM in 2013 and January 2014 were:  
Jimmy (cannot recall his surname), Lynette Glubb and Janet Dryley.

**(b) In response to question 4 you refer to the “After Hours Nurse Manager for The Park”. Is this the same AHNM that you referred to in your response to question 2? Was the position or role of AHNM one that covered The Park (including the BAC) or was it specifically for the BAC?**

- i. The AHNM for The Park is the same AHNM position referred to in my response to question 2.
- ii. The AHNM position covered The Park which included the BAC. There was no AHNM position dedicated solely for the BAC.

### **Operations & Management**

#### **2. Further to question 9, to your knowledge:**

**(a) Which role was responsible for the staffing of nursing positions at the BAC in general?**

- i. I believe it was the responsibility of the NUM at the BAC.

**(b) Which role was responsible for the appointment of each acting NUM at the BAC?**

- i. I do not know which role was responsible for the appointment of each acting NUM at the BAC. I was not involved in this process.

**(c) Was it difficult to employ nurses experienced in adolescent mental health? If so why?**

- i. I was not involved in the employment of nurses at the BAC so am unable to say whether it was difficult to employ nurses experienced in adolescent mental health.
- ii. I am aware that there are not a lot of nurses experienced in adolescent mental health.

Signed: .....  .....

**3. Further to question 26:**

- (a) **You state, “I believe that the management and clinical staff of the BAC did their best to support the patients and their families following the announcement of the closure decision.” What is the basis for this statement? Please give examples of the support provided.**
- i. This was my perception.
  - ii. I cannot give examples other than to say that the clinical staff of BAC reassured the patients and their families that a placement would be found.
- (b) **Please consider and respond to question 26 directly and more fully, providing specific names where relevant.**
- i. My response to question 26 is as direct and full as I can recall.

**Dr Sadler & Dr Brennan****4. Further to question 9:**

- (a) **You state “This [the termination of Dr Sadler] was a potentially destabilising event for the BAC patients and staff...”. Is it your evidence that Dr Sadler’s departure had no impact on the transitioning of patients out of the BAC? Why did you consider the event “potentially destabilising”?**
- i. I was not part of the transition planning team so I am unable to answer whether Dr Sadler’s departure had no impact on the transitioning of patients out of the BAC.
  - ii. I considered his departure from the BAC to be ‘potentially destabilising’ because in my opinion Dr Sadler should have been there for the transitioning of the patients as he had been working with the patients and staff at BAC for a long time.

Signed: .....  .....



- (b) **You state “... but Dr Brennan was very well received and proved to be a very good replacement.” Please elaborate on why you considered Dr Brennan to be a very good replacement. Give examples.**
- i. Dr Brennan appeared to establish a good rapport with the adolescents.
  - ii. She, like Dr Sadler, made herself available to the nursing staff seven days a week and, if required, did not hesitate to come in to review a patient.
- (c) **You state “[Dr Brennan] was more involved with the patients [than] Dr Sadler” Please elaborate on why you consider Dr Brennan to be more involved with patients than Dr Sadler. Give examples.**
- i. Dr Brennan was able to establish a good rapport with the adolescents, particularly the female patients.
  - ii. I did not mean to suggest that Dr Brennan was somehow better than Dr Sadler by being more involved. He was also very involved with the patients. I was impressed with Dr Brennan because it would have been difficult for her to step into the shoes of Dr Sadler given the length of time he had been at the BAC and I thought that she did well to establish a rapport with the patients and the nursing staff in the circumstances.

### **Closure Decision**

#### **5. Further to questions 11:**

- (a) **You state “As I worked night shifts, I was somewhat removed from the communications concerning the unit. It was usual for me to hear about operation things from other staff members.” What procedure (if any) was in place for nurses who worked night shifts to receive communications concerning the BAC?**
- i. Night duty staff would normally receive communications by email or letter but were often unable to attend meetings held during the day.

Signed: .....  .....

**(b) Please identify who the “senior management of the WMHHS” were who held and attended the meeting in November 2013 about the closure of the BAC.**

i. I cannot now recall the senior managers who attended the meeting in November 2013.

**Transition Arrangements**

**6. Further to question 18:**

**(a) You state “I remained concerned about whether suitable placements could be found for some of the patients.”**

i. **Which patients are you referring to?**

(1) I was concerned about the Patients [REDACTED].

ii. **What did you consider to be suitable placements for these patients?**

(1) I considered a suitable placement for these patients would have been somewhere similar to the BAC where there was 24 hour supervision.

iii. **Why were you concerned that such a placement could not be found?**

(1) I understood that the placements proposed for these patients only provided supervision during the day and to my knowledge there was no other facility similar to the BAC to provide 24 hour supervision.

iv. **To your knowledge, were suitable placements found for the patients you were concerned about. Please set out the reason for your opinion.**

(1) I do not know where Patients [REDACTED] actually transitioned to, so I am unable to say whether the placements were suitable placements for them.

[REDACTED]

Signed: ..... [REDACTED] .....



**Redeployment**

**7. Further to question 24:**

**(a) To you[r] knowledge, what efforts were made by the WMHHS to find future employment for you?**

- i. I cannot now recall the efforts made by WMHHS to find me a position.
- ii. They found a position for me in Acute Adult Mental Health at Ipswich Hospital.

**(b) Who were you in contact with at the WMHHS in relation to your future employment?**

- i. I was in contact with Julie Gotts and Debra Fullelove.

**(c) Who told you in early January 2014 that senior management of WMHHS wanted to talk to permanent employees about possible job offers?**

- i. I cannot now recall.

**(d) Who organised with you for you to attend the meeting with Lesley Dwyer, Julie Gotts and Peter Howard?**

- i. I cannot now recall.

**(e) Aside from the extra travel to Ipswich Hospital, was the job offered there suitable to you, such as, in terms of specialty and hours?**

- i. It was not suitable for me at the time in terms of specialty as I had not worked in Acute Mental Health since my training days in 1982-1985.

**(f) Prior to speaking with William Brennan about the job you were offered at**

Signed: .....  .....



**Ipswich Hospital, had you had professional contact with William? If so, please provide details.**

- i. I recall that I made an appointment to see him in his office to ask him if I could stay and work within The Park. I cannot recall when this occurred.
- ii. He told me there were no vacancies at The Park even though I knew of nursing staff working there on contract who to this day are still working there on contract.

**(g) Were there suitable positions with other hospitals that you could have applied for?**

- i. At the time of the BAC closure, I was an experienced mental health nurse having gained experience at The Park working with forensic patients and then adolescent patients at the BAC.
- ii. I worked at the BAC for approximately seven years which meant I did not have recent experience in acute mental health nursing. To my knowledge the adolescent mental health units at other hospitals were acute units and therefore, were not suitable to me given my lack of acute experience.
- iii. I believed my experience best suited The Park.

## **Support**

### **8. Further to questions 23, 25 and 26:**

- (a) **In response to question 23 you state that patients and staff were worried about where patients would be placed. Were you personally worried about this issue?**
  - i. I was worried about where the patients would be placed.
- (b) **In response to question 23 you state that the staff held concerns about their future employment. Did you experience or observe that this impacted upon their performance?**

Signed: .....  .....

i. Some of the staff were worried but I did not observe or experience this impacting on their performance. The staff continued to perform their duties to the standard expected.

**(c) In response to question 25 you state “During the meetings with management we were told to contact them if we had a concern”.**

**i. Which meetings with management are you referring to?**

(1) I cannot now recall the dates of the meetings I attended.

**ii. Please identify the person in management who made this statement.**

(1) I cannot now recall the person in management who made this statement.

**iii. What did you understand this statement to mean, i.e. you could share a concern, you would be provided with emotional support, or you would be assisted operationally if needed?**

(1) I understood it to mean that if I had a concern about my future employment I could contact management to find out what positions were available for me.

**iv. Did you take up this offer? If so, with whom, and what concern(s) did you share with them?**

(1) Apart from my contact with William Brennan, I did not ask for support.

**v. Did you require support? If so, what support did you require?**

(1) My request for a job at The Park was not forthcoming and I was encouraged by Will Brennan to accept the offer of employment at the Acute Adult Mental Health Unit at Ipswich Hospital.

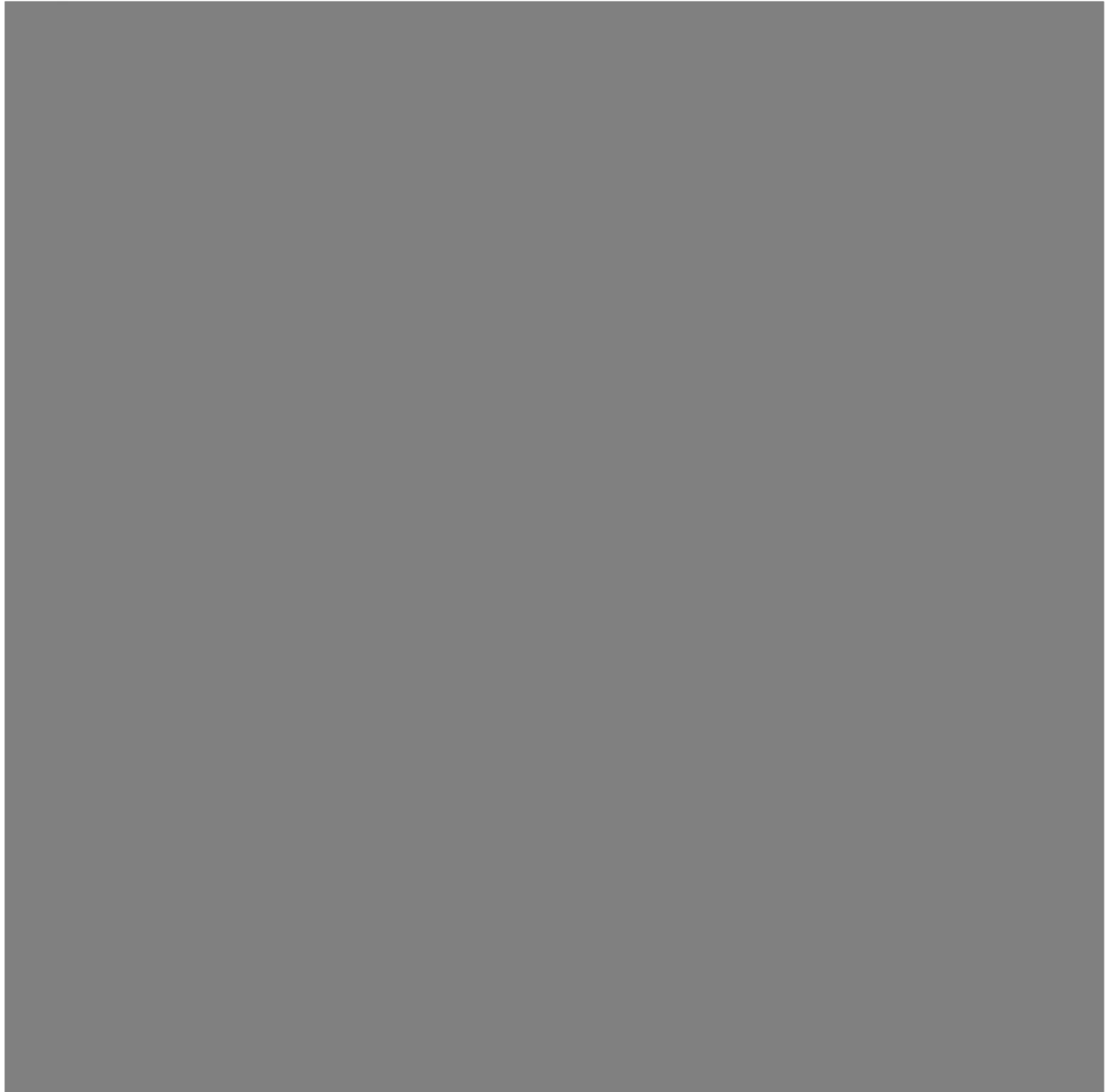
(2) When I commenced at the Ipswich Hospital I felt that I needed more support than what was offered. It was a very different environment to the BAC and I was on a steep learning curve having only been provided one day of


Signed: .....  .....




orientation. More support at this time would have been appreciated such as being supernumerary for at least one week.

**Confidential Investigation Report**




Signed: .....  .....

And I make this solemn declaration conscientiously believing the same to be true, and by virtue of the provisions of the Oaths Act 1867.

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Lourdes Wong

Taken and declared before me at Brisbane this 9<sup>th</sup> day of February 2016

  
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Judith Simpson, Solicitor