

Chronology – Acute beds at the Mater

17 October 2013 IAD.900.001.0640 Minutes of the meeting of the Chief Executive Department of Health Oversight Committee. Item 5.1 Dr Steer and Dr Stathis advise that a bed-based unit would be part of the service, that it should not be in an acute unit but rather what was explored was 4-5 beds specifically for extended treatment and rehabilitation with a HHS *“until longer term solutions were established.”*

22 October 2013 WMS.9000.0006.00906 - .00907 WMHHS Memorandum from Sharon Kelly to Executive Directors, Mental Health Services. Subject: Admissions to BAC *“CHQ has commenced work with stakeholders to develop future model of adolescent extended treatment and rehabilitation services. Further information will be provided by CHQ in the near future. Until then please contact Dr Stephen Stathis to discuss any clinical issues for patients who may require extended mental health treatment and rehabilitation and are unable to be managed in your health service.”* [Cited by Dr Stathis as an invitation to contact him about availability of sub-acute beds at the Mater but does not specifically mention sub-acute beds]

November 2013 – Stephen Stathis T24-48 lines 32 to T24-50 *“From November 2013 I had informal discussions with Dr Brett McDermott...Brett very kindly said he would accept these patients into the Mater unit if required. On 22 October 2013 a memo was sent out from Sharon Kelly to all CEs and clinical directors of services across Qld, stating that if anyone required a sub-acute bed, they should contact me. No inquiries were received. However, the plan was that if I had received an inquiry, I would then discuss this with Brett, who said that he would be very happy to accept these beds. There was no money for capital funding... We had to put sub-acute beds with an adolescent inpatient unit to fulfil the requirements of the ECRG which was hospital based beds with access to onsite schooling. And the best place we felt to do that was the Mater hospital.”* *“On 26 November 2013 I presented the whole suite of services to the quarterly meeting of the faculty of child and adolescent psychiatrists. ... Dr Brennan was at the meeting.”*

But note cross-examination of Dr Stathis by Mr Diehm QC at T24-91 to T24-104.

26 November 2013 RAN.500.0001.0001 Quarterly Meeting: Minutes Meeting of the Faculty of Child and Adolescent Psychiatry of the RANZP Queensland. *“Item 3.4 SS provided update on the follow up from BAC closure issue. Plans for extended treatment and rehabilitation services from West Moreton funding. 5 tiers identified – Assertive Community treatment (AMYOS), Day units, Step-up-Step down units (Y-PARCs), bed-based sub-acute unit, Youth Residential Services (16-25 yr olds).”*

27 November 2013 PMB.001.002.195; WMS.1007.0009.00035 (attachment BMCM-14 to the affidavit of Brett McDermott) *“Transition Service Planning”* *“Tier 3 Option – CHQ meeting with Brett McDermott to discuss arrangement between CAFTU and Mater Inpatient Acute Unit = aiming to temporarily secure 2 or 3 beds for extended treatment & rehabilitation from Feb 2014. Mater may request \$”.*

2 December 2013 QHD.004.005.6878 Minutes Statewide Adolescent Extended Treatment and Rehabilitation Implementation Strategy Chair: Clinical Director CYMHS CHQ HHS (SS) *"Item 5 Matters for Discussion 5.1 "Draft Model of Care" SS noted the interim subacute inpatient unit being discussed with the Mater. It is hoped that it will be in place until the Mater Unit closes in November 2014. Next step is to determine how consumers are referred in. BAC consumers will have first preference. DM discussed the budget cycle process and stated that we won't know what new funding will be provided until the next funding cycle mid-2014."*

20 December 2013 MHS.001.003.0884 Email from Brett McDermott to John O'Donnell, Mish Hill cc'd to Sean Hubbard and Erica Lee. *"Peter Steer has difficult task of replacing Barrett service by 31 January 2014. Clearly there will be no purpose built solution by then, he has sought the help of the Mater CYMHS in the interim. The proposal is that the Mater will provide a package of care for [REDACTED] who would have otherwise been admitted to the Barrett. There are ongoing Mater CYMHS discussions about what this would look like. It could include holding 3 beds in the inpatient unit for Barrett admissions, admissions would be up to 3 months."*

January 2014 DSS.001.001.218 Steering Committee Paper *"By February 2014 a 5-bed residential rehabilitation unit at Greenslopes and an interim sub-acute bed-based unit at the Mater will be in place."*

January 2014 IAD.900.001.0688 Paper was given to the Chief Executive Department of Health Oversight Committee that spoke of a plan to establish a 4 bed "safe and secure" sub-acute bed based unit (not suggested to be an acute unit) and that by February 2014 an interim sub acute bed based unit at the Mater Hospital would be in place.

22 January 2013 but should say 2014 DSS.001.001.353 SWAETRI – Oversight Committee *"PS to meet with Mater to discuss and seek agreement re: interim bed-based option. Due date 28/01"*

28 January 2014 MHS.001.003.0968 Email (in same chain as above email of 20 December 2013) from Sean Hubbard to John O'Donnell and Brett McDermott *"Discussed with Peter: 1) They need to commit to the board by Thursday re us having "back stop" beds available – I have said that we would assist. 2) Ideally they will use outreach services and not have to use the beds 3) They would like them available in early February – I have indicated that we may need to recruit to roles so will see what we can do, but early to mid Feb should be achievable. 4) Price – Brett, Peter requested that we revert to him with a marginal cost of delivery and that they would handle the normal CYMHS demand that we might need to turn away should we accept patients from him. Could you give me an idea of what value is needed for this service? Given your current model I would think a retainer (bed availability) basis would be best. Regards, Sean."*

End of January 2014 – Dr Bill Kingswell statement DBK.900.001.0001 at .0012 paragraph 22 (xi) *"At the time of closure of the BAC there were 2 Tier 3 beds available at the Mater Hospital. These beds were transferred to the LCCH upon its opening in November 2014 and there are now 4 Tier 3 beds at the LCCH."*

Kingswell at T31-25 lines 23-26 *“Peter Steer made an arrangement with John O’Donnell to provide 2 beds at the Mater and committed to increasing that to 4 beds when the LCCH opened.”*

End of January 2014 - Dr Leanne Geppert – WMS.9000.0004.00001 at .0213 LG-25 Briefing note for noting prepared by CHQ and WMHHS after closure of the BAC. Subject: Closure of the Barrett Adolescent Centre and status of new adolescent mental health services. Key Issue 7(b) *“In addition the following services are currently being established: from early February 2014, the Mater Hospital will provide two interim subacute inpatient beds until new funding is sourced for a longer term bed-based option in the LCCH.”*

See cross-examination of Dr Geppert by Mr Diehm QC at T10-36 line 29-30 *“So you contributed to the writing of this document [referred to above] as at 4 February 2014 – Yes. And can we take it from what we’ve seen now of the contents of the document that as at that date the two sub-acute beds at the Mater were not available? Yes. I think that’s fair to say.”*

February 2014 - Dr Stephen Stathis – supplementary affidavit - DSS.001.002.001 at .022 At paragraph 69 he indicates sub-acute beds at the Mater/LCCH were to be available from February 2014.

26 February 2014 QHD.004.006.0434 Email from Erica Lee (Mater) to Stephen Stathis (Department) cc’d to Judi Krause, Amanda Tilse, Brett McDermott entitled FW: Extended Treatment Beds.doc Attachment: BAC-type Patients Program.xlsx *“Hello Stephen, Please find attached the costing calculation for the Extended Treatment Beds. We now have approval to release this information to you... With regard to the admission criteria and protocols for use of these beds, I would suggest that you speak with Brett prior to taking this agenda item to the statewide meeting next week.”*

10 March 2014 JKR.900.001.0001 at .0176 and DSS.001.001.230 Minutes of meeting of the State-wide Adolescent Extended Treatment and Rehabilitation Implementation (SWAETRI) Strategy Committee Item 6.4 *“Mater sub-acute inpatient beds were briefly discussed and it was confirmed that the Mater is setting up two “swing” beds”* – still being set up as at 10 March 2014. (see cross-examination of Dr Geppert T10-38 lines 1-26) *“SS noted there are four actions needed to formalize the beds, which will be progressed by the Service Implementation Working Group: terms of reference; referral pathway; communication to other HHSs; service agreement with the Mater.”*

2 June 2015 DSS.001.001.243 Minutes Adolescent Mental Health Extended Treatment Initiative Steering Committee *“Subacute Beds: Service Agreement is still being finalized by the CHQ Chief Financial Officer prior to sending to the Mater. AT confirmed that the beds are available at the Mater. Further communication around the beds is needed. There have been no referrals to date and, if the beds are not used, it will make it difficult to get further funding for the beds planned for at the Lady Cilento. It is unclear whether these consumers are being treated at acute inpatient units or if there is no need in the sector. ... LG suggested having the Project Officer conduct a structured evaluation around communication and level of awareness – do staff know what is available and how they are able to use it.”*

Mid 2015 DAB.005.0001.0006 3rd statement of Dr Brennan – Dr Brennan telephoned Dr Stathis to enquire as to when the sub-acute beds at the Mater became available – he advised that verbal cost estimates were given by the Mater on 19 February 2014, the beds were funded in July 2014, and the beds became available between August and September 2014.

22 July 2015 IAD.900.001.0749 Email from Ingrid Adamson (CYMHS) to Stephen Stathis Subject: Mater Subacute Beds. *“Hi Stephen – the chronological order of events for the subacute beds. On 28th January 2014, CHQ representatives (Dr Peter Steer, Dr Stephen Stathis, Ingrid Adamson) had a teleconference with Dr Brett McDermott, Mater regarding the provision of subacute beds – Dr McDermott gave verbal confirmation of service provision and indicated that the Mater would provide a budget for this. Mater submitted a budget, preparation commenced on 19th Feb, and final version received by CHQ in early April 2014. CHQ sent service agreement for Mater’s signing on 15th April 2014. Mater eventually signed on 16th September 2014, despite monthly follow ups for the agreement. Only [REDACTED] utilised the subacute beds in the latter half of 2014; however, [REDACTED] did not require any additional wrap around resources, so the Mater never invoiced for service provision, under the Agreement. Regards, Ingrid.”*