

The Scottish Hospitals Inquiry

Hearing Diet: 12 June 2023 to 23 June 2023 (Glasgow 2 hearing) - Closing Statement by IBI UK Limited (IBI)

Introduction

1. This closing statement is submitted by IBI in response to the closing statement by Counsel to the Inquiry (CTI), distributed to core participants on 21 July 2023.
2. It remains the intention of IBI to continue to assist the Inquiry to the fullest extent possible. However, as the preponderance of evidence led during the Glasgow 2 hearing did not touch upon the interests and responsibilities of IBI, this statement is necessarily limited in nature, confined to addressing the more general questions posed within CTI's closing statement.

Response to CTI's Statement

3. IBI considers that CTI's closing statement correctly identifies the key themes that emerged from the evidence provided at the Glasgow 2 hearing, whether orally or in witness statements.

Chapters 1-3, 5 and 7

4. IBI accepts that the account of evidence summarised by CTI is materially accurate.
5. IBI agrees that witnesses provided their evidence in a genuine and honest manner, and were doing their best to assist the Inquiry. However, it is submitted that, until all of the evidence has been considered, it is premature to conclude, definitively, that those accounts are wholly reliable and accurate.

Chapter 4

6. IBI accepts that CTI's detailed narrative represents a materially accurate summary of evidence provided to the Inquiry. Given their subject matter, it is submitted that the remaining questions are better addressed by other core participants.
7. With regard to the issue of whether identified infections may have been caused by the built environment, IBI agrees that the Inquiry ought to take into account the evidence of clinicians who spoke to infection patterns, along with all other relevant evidence to be led on this matter.

Chapter 6

8. IBI considers that the issue of communication with patients and families is better addressed by other core participants.

Dated this 18th day of August 2023
Womble Bond Dickinson (UK) LLP, Solicitors for IBI UK Limited