#### **INQUIRY INTO THE DEATH OF DAWN STURGESS**

# SUBMISSIONS ON BEHALF OF SOUTH WESTERN AMBULANCE SERVICE NHS FOUNDATION TRUST

1. These submissions are filed on behalf of South West Ambulance Service NHS Foundation Trust ('SWASFT') in respect of the agenda that has been set for the preliminary hearing on 11 November 2022.

#### **Disclosure**

2. SWASFT has provided all information for Stage 1 of the disclosure process to the ILT as previously directed. There is nothing outstanding from SWASFT at this time, so far as it is aware.

### **Venue for Substantive Hearing**

3. SWASFT strongly prefer a Salisbury venue to be used for all or part of the OPEN hearings because this inquiry is of key importance to the people of Salisbury; and, secondly due to SWASFT's preference for its staff not to have to attend to give evidence in London. SWASFT support hybrid hearings and remote access for other attendees.

## **Any Other Business**

- 4. There are no other matters that SWASFT wish to raise at the preliminary hearing.
- 5. As a public body, SWASFT has to be mindful of avoiding spending unnecessary costs and resources where appropriate. In light of SWASFT's peripheral role at the preliminary hearing on 11 November, it requests permission to be excused from attendance.
- 6. Such a decision would not prejudice the Chair's ability to manage the necessary issues for this hearing, nor would it prejudice the other Core Participants.

- 7. The Chair's discretion for such a decision falls under s.17(1) Inquiries Act 2005. S.17(3) says that "In making any decision as to the procedure or conduct of an inquiry, the chairman must act with fairness and with regard also to the need to avoid any unnecessary cost (whether to public funds or to witnesses or others)."
- 8. In the alternative, SWASFT request permission for its representatives to attend the hearing remotely.

Bevan Brittan LLP
On behalf of South West Ambulance Service NHS Foundation Trust
31 October 2022