2 May 2023 (Day 110)
Lucy Letby - Examination-in-chief day 1: Background and general topics

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MS LUCY LETBY (sworn)
Examination-in-chief by MR MYERS

Tuesday, 2 May 2023
(10.30 am)

(In the absence of the jury)

MR JUSTICE GOSS: Just by way of information, the reasons for my ruling on Friday will be made available to you later today.

MR MYERS: Yes, thank you, my Lord.

(In the presence of the jury)

MS LUCY LETBY (sworn)

Examination-in-chief by MR MYERS

MR MYERS: Ms Letby, would you give the court your full name, please?

LETBY: Yes. Lucy Letby.

MYERS: And what's your date of birth, Ms Letby?

LETBY: 4 January 1990.

MYERS: So you're now 33 years old?

LETBY: Yes.

MYERS: In the period that we're looking at in the most detail in this case, between June 2015 through to June 2016, you were 25/26 years old?

LETBY: That's right, yes.

MYERS: Which part of the country were you born in, Ms Letby?

LETBY: Herefordshire.

MYERS: I want you to tell us a little bit about that and becoming a nurse first. That's the first thing I'm going to ask you about.

Are your family from Herefordshire?

LETBY: Yes, they are, yes.

MYERS: Whereabouts in Herefordshire did you grow up, not the precise address but the area?

LETBY: Within Hereford city centre itself.

MYERS: And who did you grow up with in your house?

LETBY: It's just myself and my mum and dad.

MYERS: And did you go to school locally?

LETBY: Yes.

MYERS: Where did you go to college?

LETBY: I went to the local sixth form college.

MYERS: When was it that you first knew you wanted to be a nurse?

LETBY: I've always wanted to work with children but it was towards the end of secondary school that I thought I wanted to do nursing and then picked A level subjects that would best support that career.

MYERS: All right. Did you have to go to university to study nursing?

LETBY: Yes.

MYERS: Is that something new for someone in your family?

LETBY: Yes, I was the first person in the family to go to university, yes.

MYERS: You're doing well with your voice. It's important to keep it up. You've heard other witnesses being asked to do that so make sure you speak across to the jury and keep your voice as loud as you can.

Where did you do your nursing degree?

LETBY: At the University of Chester.

MYERS: And can you help us, how long is the course that you take to become a nurse?

LETBY: It's a three-year degree programme.

MYERS: And do you spend all of it in the university or are bits of it spent out in hospitals?

LETBY: It's 50/50. Part of it is theory-based at the university and then you have numerous placements throughout that time in different clinical areas to give you experience of different areas of nursing.

MYERS: Did you ever get any familiarity with the Countess of Chester before you went to work there?

LETBY: Yes, the majority of my placements, clinical placements, were at the Countess of Chester.

MYERS: And any particular unit on the Countess of Chester?

LETBY: Yes, either the children's ward or the neonatal unit.

MYERS: When did you qualify as a band 5 nurse, Ms Letby?

LETBY: September 2011.

MYERS: And is that -- does that coincide with the end of your degree or was there some further training you had to do to become band 5?

LETBY: No, that was the end of my degree training.

MYERS: Over the period of 2015 to 2016 -- we you know we're looking at a number of babies in this indictment and you understand that, don't you?

LETBY: Yes.

MYERS: There's 17 of them.

LETBY: Yes.

MYERS: But could you put a figure on the number of babies you cared for over that 12-month period?

LETBY: Probably hundreds.

MYERS: Hundreds?

LETBY: Yes.

MYERS: And did you care for them?

LETBY: Yes.

MYERS: Did you ever do anything that was meant to hurt any of them?

LETBY: No, I only ever did my best to care for them.

MYERS: Did you ever want to hurt any baby you looked after?

LETBY: No, that's completely against everything that being a nurse is: I'm there to help and to care, not to harm.

MYERS: All right. I want to ask you next about the period in fact after you were removed from clinical duties. So we're looking at the period in July 2016 when you were moved away from clinical duties.

Why did you think you were being put in a non-clinical role that July?

LETBY: That there'd been an increased mortality rate on the unit and as a result numerous members of staff were having to go through a competency check and redo their competencies and that would be starting with myself.

MYERS: And how did you come to believe that is what was happening?

LETBY: That's what I was told.

MYERS: And who were you told that by?

LETBY: By management within the hospital and the executive team.

MYERS: That you were going to be undergoing training or testing in your competencies?

LETBY: Yes.

MYERS: Is it something you had volunteered to do?

LETBY: No.

MYERS: Is it something you were keen to do?

LETBY: No.

MYERS: How did you feel when you were removed from clinical duties and were told that your competencies were going to be checked like this?

LETBY: I was devastated.

MYERS: Why were you devastated?

LETBY: Because I've always prided myself on being very competent and the fact that potentially I hadn't been competent in something really, really affected me, and to be taken away from the job that I loved, it was very difficult.

MYERS: When you say it really affected you -- could you convey to the ladies and gentlemen of the jury the extent of that when you say it really affected you?

LETBY: It was just -- it was life-changing in that moment. I was taken away from the support system that I had on the unit, I was then put into a non-clinical role that I didn't enjoy. I had to pretend to a lot of people that that was a voluntary process, which it wasn't, and from a self-confidence point of view it completely -- well, it made me question everything about myself.

MYERS: Right. When was it, so far as you can recall, you first discovered that you were being held responsible for harm to babies on the unit or their deaths?

LETBY: Not until the September of 2016.

MYERS: What event was it in September 2016 that led to you discovering that you were being held responsible for deaths of babies?

LETBY: I received a letter from the Royal College of Nursing in which they had been informed that actually the true reason for my redeployment was because I was being held responsible.

MYERS: We're thinking about -- do you remember roughly what date that would have been that you received that letter? Not the precise day but maybe which month.

LETBY: It was September.

MYERS: September 2016?

LETBY: Yes.

MYERS: And what was going on that meant you received that letter at about that time? What was taking place or about to start?

LETBY: So I was looking at putting in a grievance procedure.

MYERS: About what?

LETBY: About how I'd been redeployed from the unit and the information that I'd been given in relation to that.

MYERS: Did you have any idea how many babies you were being held responsible for harming or for their deaths?

LETBY: No.

MYERS: How did it make you feel when you received the news that you were being held responsible?

LETBY: Well, it was sickening, it was -- I knowledge couldn't believe it.

MYERS: I want you to describe how best you can -- it may not be easy, but describe as bet you can what it felt like to have that being said about you, Ms Letby, if you can.

LETBY: I mean, it was devastating. I don't think there's -- I don't think you can be accused of anything worse than that. And... Yeah, I was just devastated.

MYERS: Well, you tell us how it affected you, that might be another way of looking at this. What was the effect of this on you, what happened?

LETBY: I just changed as a person: my mental health deteriorated and I felt very isolated from my friends and family on the unit and...

MYERS: Just pausing there, when you say isolated, of course you'd been removed from the neonatal unit. Had you had friends on the neonatal unit?

LETBY: Yes, a lot of friends. We were a very supportive unit as well. Regardless of whether we were personal friends, we were a very supportive nursing team (overspeaking) --

MYERS: When you moved on to -- sorry, I interrupted you.

LETBY: It's okay.

MYERS: When you moved to a non-clinical role and you were being told that you'd undergo the competency testing, were you able to explain that to other people on the unit?

LETBY: No. So at that time, the hospital advised me not to communicate with anybody on the unit and to sort of go with the pretence that it was a voluntary secondment and it was identified at that time that there were two or three friends

that I would be able to speak to but otherwise I was not to have contact with anyone on the unit.

MYERS: You say it was identified there were two or three friends you could speak to, who were they?

LETBY: It was [Nurse E], [Dr A] and Minna Lappalainen.

MYERS: [Nurse E]?

LETBY: Yes.

MYERS: [Dr A]?

LETBY: Yes.

MYERS: And Minna Lappalainen?

LETBY: Yes.

MYERS: You'd said that you had felt isolated, you had been describing how it felt when you learned you were being blamed for a death or deaths. You made a reference to your mental health. Did you have to go and seek any assistance with how it affected you, mentally speaking?

LETBY: I did, yes, I went to my GP. I wasn't sleeping, I wasn't eating. I just had a complete change in my whole life and I was starting on some anti-depressants at that point, which I remain on now.

MYERS: So did the GP put you on antidepressants?

LETBY: Yes.

MYERS: If it doesn't seem too obvious a question, what's that for? What were you given them for? What state were you in?

LETBY: They diagnosed me with depression and anxiety at that time.

MYERS: And you say you've remained on that medication?

LETBY: Yes.

MYERS: And are you receiving that now?

LETBY: Yes.

MYERS: Do you take any other medication at the moment?

LETBY: I also take medication to help with sleep -- yes, I am unable to sleep without medication.

MYERS: How bad did the negative feelings get so far as you're concerned about yourself, how bad?

LETBY: There were times when I didn't want to live.

MYERS: And what did you want to do? What did you think of doing?

LETBY: To myself?

MYERS: Yes.

LETBY: I thought of killing myself.

MYERS: Had you done anything wrong?

LETBY: No.

MYERS: Why did you think of killing yourself, somebody might ask?

LETBY: Because of what was being inferred.

MYERS: How hard had you worked to become a nurse?

LETBY: Very hard.

MYERS: How much did it matter to you?

LETBY: My job was my life. It was... It was everything.

MYERS: How did it feel to have that taken away and be held responsible for the deaths of babies you'd cared for?

LETBY: I can't put that into words. It's just... My whole world just stopped.

MYERS: Have you ever been able to recover your kind of mental ease after all of this started?

LETBY: No, I think it's just progressively got worse.

MYERS: How hard is it to cope with what you're being accused of?

LETBY: It's very difficult.

MYERS: If you think back to the young woman you were when you were 25 or 26, before you were taken off the unit, before you

were being blamed for what happened, are you the same person in yourself now as you were then?

LETBY: No, I think it's completely changed everything, a lot about me and about my life, about the hopes that I had for the future, everything has just gone.

MYERS: Where have you been living since November 2020? What type of place?

LETBY: So I've been remanded in prison since that time.

MYERS: That's since your third arrest in November 2020?

LETBY: Yes, I've been in four different prisons since then.

MYERS: I'm not going to ask you the locations of any prison, Ms Letby, I don't invite you to do that. But before that first arrest in July 2018, had you ever been in trouble with the police before for anything?

LETBY: No.

MYERS: I'm going to ask you a little bit about the experience of arrest and prison. When I do that, I make it absolutely clear that we are grateful to the officers at court and those who bring you to and from court and the cell staff for the care you have received. That's the same for you isn't it, Ms Letby?

LETBY: It is, yes.

MYERS: So we are just looking at the effect of events on you. There is nothing at all critical about the people caring for you --

LETBY: No.

MYERS: -- and we are grateful for that.

You were arrested for the first time on 3 July 2018?

LETBY: Yes.

MYERS: Had you ever experienced anything like that before?

LETBY: No.

MYERS: Are you able to just describe in simple terms the impact of arrest and that process on you? Let me start with this: how did you know the police were coming that day? What's the first you knew?

LETBY: When there was a loud knocking at the door at 6 o'clock in the morning by the police.

MYERS: You were at home in 41 Westbourne road Chester; is that right?

LETBY: I was, yes.

MYERS: Were you on your own there, as it happens?

LETBY: No, my father was staying with me at that point, so he was there as well.

MYERS: Had you any idea the police were coming that day?

LETBY: No, none at all.

MYERS: So when they came, what happened with you?

LETBY: They told me that I was being arrested for multiple counts of murder and attempted murder and then they quickly handcuffed me and took me away.

MYERS: All right. And you were taken to a police station; is that right?

LETBY: In my pyjamas, yes.

MYERS: And over the next 3 days you were interviewed at various times?

LETBY: Yes.

MYERS: And we've asked DS Stonier about that. Again, the way that was done is just the way the police deal with it and that's not critical of them for the process they followed.

When that process had ended after the 3 days of interviews, were you released from police custody?

LETBY: Yes, I was, yes.

MYERS: On bail?

LETBY: Yes.

MYERS: And did you have to live anywhere in particular after that?

LETBY: Yes, as a part of my bail conditions, I wasn't allowed to return to my house in Chester, so from that point on I then lived with my parents back in Hereford.

MYERS: Is that where you were living when we come to the time of your second arrest on 10 June 2019?

LETBY: It is, yes.

MYERS: And on that occasion did you know the police were coming that day?

LETBY: No, it was a mirror image of the time before. It was just loud banging and knocking at the door and we opened it to find police there.

MYERS: It may be difficult taking your mind back to these things, Ms Letby, but so that the jury understand, what was the impact on you, the banging and the being arrested again, if you're able to say?

LETBY: It was just the most -- the scariest thing I've ever been there. It not only happened once, it happened twice and then a third time, and it's just... It's just traumatised me, I just...

MYERS: The third time was on 10 November 2020?

LETBY: Yes.

MYERS: And that's the time after which you weren't actually released, you were kept in prison?

LETBY: Yes.

MYERS: And you've been in prison since then?

LETBY: I have, yes.

MYERS: When you say it traumatised you, we've heard that you're on medication. So we can understand, has it left you sensitive to particular things, so the jury understand, certain things that affect you in certain ways?

LETBY: Yes. The biggest way it's affected me is I just -- I'm very sensitive to any noise, any unexpected change or new people. I'm easily startled, easily frightened of things.

MYERS: Were you like that before the arrests began?

LETBY: No, not at all.

MYERS: And have you received psychological support in prison and at court, as we've been going forwards?

LETBY: I have, yes. I've been diagnosed with PTSD in direct relation to the arrests, yes.

MYERS: Right. And so far as being at court is concerned, again, we're grateful to all those who care for you and bring you to and from court, but without going into the businesses of locations, how long is the trip to court each morning for you?

LETBY: It's usually around an hour and a half each way.

MYERS: And the same in the evening?

LETBY: It is yes.

MYERS: What time do you normally get up before you come to court?

LETBY: About half past 5.

MYERS: Where do you have your breakfast?

LETBY: I have my breakfast when I arrive here at court, we leave about 6.30 in the morning and I eat when I arrive here. I also get quite bad travel sickness so I wait and eat my breakfast when I've arrived here.

MYERS: What time do you get back to the prison in the evenings as a general rule?

LETBY: Usually around 7 pm.

MYERS: We have all seen various notes that were taken by the police that you had written. You know the notes I'm referring to, don't you?

LETBY: Yes.

MYERS: We're going to look at a number of them as we're going through your evidence, Ms Letby. Not all in one go but at various points. But just to help the jury with this, in general, are you the sort of person who writes things down in notes, on notes?

LETBY: Yes, it's something I've done my whole life. That is my way of dealing with things, just day to day. That is what I've always done, I've always written things down.

MYERS: And do you throw them away always when you've written things down?

LETBY: No, I never throw anything away. I have difficulties throwing things away, everything is just kept.

MYERS: Right. Let's look at the note which we've got in the images the prosecution gave us. It's the prosecution images, page 18. We'll see if Mr Murphy can help us with that.

We'll look at a close-up in a moment, but I'm going to ask you some questions about the note that's on the right-hand side of this page, Ms Letby. Were the notes like this in your house or is just how they have been arranged for the purposes of photographing it?

LETBY: No, that's how it's been arranged.

MYERS: So the police have set it out so we can see it for the photograph?

LETBY: Yes.

MYERS: Do you know hen it was -- can we go to page 19, in fact, Mr Murphy, so we can see the note more clearly? Thank you. We'll have a look at this in a moment, Ms Letby. But do you recall when it was that you would have written this, what period of time?

LETBY: After my removal from the unit in 2016 and prior to my arrest, this time.

MYERS: Do you know any precise date when you wrote it?

LETBY: No.

MYERS: We're going to have a look at what's written here. Look at the top if you would. It says, "Not good enough"; yes? Why have you written "not good enough" and underlined it, if you can tell us, just doing the best you can, all right? Why have you written "not good enough" and underlined it?

LETBY: I think that's the overwhelming thought and feeling that I had about myself at that point, that I wasn't good enough.

MYERS: And why did you think you weren't good enough?

LETBY: Because of the way people had made me feel.

MYERS: Had you actually done anything wrong to hurt any babies?

LETBY: No.

MYERS: How were you feeling because of the things that people were saying about you?

LETBY: I felt an immense responsibility. I thought that I had been incompetent or done something wrong that had harmed children.

MYERS: When we're looking at the notes, do you -- is it the case you've always written everything we see on them on one occasion or are they sometimes written at different times, bits of the notes?

LETBY: It can be both.

MYERS: Right. We're going to track across this. It says on the left:

"There are no words."

That seems to carry on on the left-hand side:

"I can't breathe, I can't focus."

Perhaps you could read it, Ms Letby.

MR JOHNSON: The objection isn't to my learned friend reading the words, it's to him interpreting that one bit follows another. I'd rather the witness said which bit was written by --

MR MYERS: That's fine.

"There are no words." What would come after "there are no words" when you look at that?

LETBY: The text to the left-hand side, "I can't breathe, I can't focus".

MYERS: Right.

LETBY: "Overwhelming fear and panic."

MYERS: And what's that describing when it says:

"There are no words. I can't breathe, I can't focus. Overwhelming fear and panic"?

LETBY: That's how I felt about my life at that moment in time.

MYERS: Under that it says, "I haven't done anything wrong". Why does it say, "I haven't done anything wrong"?

LETBY: Because I haven't done anything wrong.

MYERS: Who are you writing this note for or to?

LETBY: It wasn't to anyone, it was just me processing my thoughts. It was never meant to be read by anyone.

MYERS: Can you help us with why it says "police investigation" on the left-hand side under that?

LETBY: Because I knew that, ultimately, the worst-case scenario would be that the police would be involved, and that was something that had been threatened by the hospital.

MYERS: Why under that does it say, if you can help us, "Slander, discrimination"?

LETBY: That's how I felt that the trust and hospital -- that's how I felt they were towards me, that it was slander and discrimination.

MYERS: And what was slander and discrimination?

LETBY: The allegations.

MYERS: Under that, it says, "All getting too much". What follows on from "all getting too much" when we look at the note, if anything follows on?

LETBY: Um... "Everything's taken over my life".

Um... I think it's:

"... everyone and I feel very alone and scared."

MYERS: All right. Is that how you were feeling?

LETBY: Yes.

MYERS: I want to look across to the right-hand side, if we could, for the time being. Reading down the right:

"I'm an awful person. I pay every day for that right now."

You tell me if I read anything incorrectly by the way.

LETBY: Yes.

MYERS: Why are you saying:

"I'm an awful person. I pay every day for that right now"?

LETBY: Because at that time I did feel that I must be an awful person to have made any mistakes that had harmed anyone and that I was paying the price for that by what had happened to me.

MYERS: And what had happened to you at this point, as best as you can remember?

LETBY: That I'd been taken away from the job that I loved and accused of things that I just hadn't done.

MYERS: Underneath it says:

"I'll never have children or marry."

Can you read the next bit, "I'll never..."?

LETBY: "... never know what it's like to have a family."

MYERS: Right. Why were you saying that?

LETBY: Because at that time I couldn't see any future for myself. I couldn't imagine what my life was going to be or that I'd ever have a future.

MYERS: This is all your handwriting; do you agree?

LETBY: It is, yes.

MYERS: Why have you written "no hope" at an angle towards the side of the note on the right-hand side?

LETBY: Because there were times when I didn't have any hope. My whole situation felt hopeless at times.

MYERS: And at the same kind of angle a bit below that it says "despair"; can you see that?

LETBY: Yes.

MYERS: What is that describing?

LETBY: Again, one of the emotions that I was feeling at that time.

MYERS: Just to the left of "despair" it says -- does it say:

"Hate myself so much for what this has..."

And then it's hard to read, we can perhaps scroll down a bit. Let's see if that follows through with anything. Thank you, Mr Murphy.

Does it follow with anything or does it just run out at "what this has"?

LETBY: I believe it just runs out there, I think.

MYERS: It says:

"Hate myself so much for what this has..."

And then we can see a circle heavily in ink and the word "hate" in it?

LETBY: Yes.

MYERS: Why did you say:

"Hate myself so much for what this has..."?

Why did you say that in the note?

LETBY: Because at that time I did hate myself.

MYERS: You've said in the note:

"I haven't done anything wrong."

So people might think, well, how do you hate yourself if you haven't done anything wrong?

LETBY: Because I was made to feel that I had done something wrong, so potentially -- I though I had been incompetent in some way.

MYERS: What kind of mental state were you in at the time you were writing this note?

LETBY: Not good at all.

MYERS: Had you been to see the doctor by this time or not or do you not know?

LETBY: I couldn't say, but throughout that period my mental health was poor.

MYERS: How well were you coping with the situation you were in?

LETBY: I did my best, but it was difficult in the circumstances with the isolation that I felt and -- yeah, it was difficult.

MYERS: We know you were first arrested in July 2018. How long a period was this kind of thing going on for and these sort of thoughts going on for?

LETBY: Two years.

MYERS: Carry on looking across to the left-hand side again now. Following from where it says -- can you see:

"How can I get through it?"

Do you see that, Ms Letby?

LETBY: Yes.

MYERS: "How can I get through it?"

What's directly under that, please? Could you read the next --

LETBY: "How will things ever be like they were?"

MYERS: And then if we carry on on the left-hand side and it says:

"I don't deserve to live."

Is that what it says?

LETBY: Yes.

MYERS: Then does it say:

"I killed them on purpose because I'm not good enough"?

LETBY: Yes.

MYERS: Was there anything that follows on from that? "Because I'm not good enough", does it stop or does it carry on?

LETBY: "I'm not good enough to care for them and I'm a horrible, evil person."

MYERS: Right. When you say "kill them on purpose", does that mean you've gone and done something intentionally to harm them and kill them?

LETBY: No.

MYERS: What are you meaning when you say:

"I killed them on purpose because I'm not good enough to care for them"?

LETBY: That I hadn't been good enough and I'd in some way failed in my duties and my competencies.

MYERS: Why did you think you hadn't or you might not have been good enough?

LETBY: Because that was the suggestion throughout, that I had to redo competencies, that I'd been removed from the unit. I felt that I'd done something wrong. That's what was insinuated to me, that my competencies had to be rechecked.

MYERS: It says, "I don't deserve mum and dad".

LETBY: Yes.

MYERS: And then:

"World is better off [is that] without me"?

LETBY: Yes.

MYERS: What's the bit that follows that "without me"?

LETBY: That says Tom and Matt, who are my cousins.

MYERS: Is that one sentence or is that different things?

LETBY: No, I've written there:

"I don't deserve mum and dad, Tom and Matt."

And I think, "World is better off without me", is separator to that.

MYERS: So you say you don't deserve your mum or your dad or your cousins and you have also said the world is better off without you?

LETBY: Yes.

MYERS: And it says at the bottom, "I am evil, I did this". Why did you say that?

LETBY: Because I felt at that time if I'd done something wrong and I didn't know I had done that, I must be such an awful, evil person if I'd made mistakes and not known.

MYERS: But we've seen at the top of the note, the actual heading of it underlined is "Not good enough". So what did you believe had happened or you'd done or might have done?

LETBY: That somehow I'd been incompetent and that I'd done something wrong which had led to -- affecting those babies.

MYERS: Just looking on the right-hand side at an angle, it says, "Panic, fear, lost"; do you see that?

LETBY: Yes.

MYERS: What's that describing?

LETBY: That was how I was feeling.

MYERS: Under "hate" it says, "I did this". Can you see, "I did this"?

LETBY: Yes.

MYERS: What do you mean when the note says, "I did this"?

LETBY: That I felt I must be responsible in some way.

MYERS: You've also written, "Why me?" If you're able to, can you help us with why it says, "Why me"? If you can.

LETBY: Because I didn't understand why it was happening to me. I thought I'd always been competent, I'd always done my best. I couldn't understand why it was happening to me.

MYERS: Looking back on this now, as much as you can, how were you coping with the situation you were in at the time you wrote this note?

LETBY: I think, looking back on it now, I was really struggling. This is a way of me expressing everything that I felt at that time that I wasn't able to say to anyone else.

MYERS: You told us earlier that writing things down is a way that you deal with them; is that right?

LETBY: Yes.

MYERS: Writing them down in words on bits of paper like this, is that something you've done in the past?

LETBY: Yes, it's what I do regularly. It just can be on any piece of paper, just randomly, yes.

MYERS: Well, as I've said, there's other notes and papers and we will return to them as we go along so we can have a look at what you have said and you help us with bits of them as best as you can. Just to assist you, and also to assist the court and the ladies and gentlemen of the jury, just so we know how we're going to deal with your evidence, if we can, with your assistance we're going to go through all the kind of general background and pieces of evidence to do with things the police found or how the unit worked, general type of material. That might take a little while. Then when we've done that, we'll turn to looking at the babies on the indictment to which the allegations relate. All right?

LETBY: Yes.

MYERS: That's just so we can all keep track of where we're going and how we'll deal with that. We can take the note down, please.

How does it feel inside yourself when, for instance, I ask you questions about the arrest process and you're talking about banging on the door and things?

LETBY: It's uncomfortable for me.

MYERS: Looking at the notes and things, how does that feel?

LETBY: The same. I'm a very private person and those weren't meant to ever be read.

MYERS: If you don't mind me saying, however private you are, Ms Letby, can you keep your voice up so we can all hear what you're saying now? Thank you.

I'm going to ask you next a little bit more about the Countess of Chester neonatal unit and some aspects of the work that goes on there. All right?

LETBY: Yes.

MYERS: Can you remember when it was that you first experienced working at the Countess of Chester neonatal unit?

LETBY: Yes. I had a placement there during my nurse training. I think it was in 2010. That was the first time I'd ever been on a neonatal unit.

MYERS: Do you remember when it was that you started there full-time as a qualified nurse?

LETBY: Yes, January 2012.

MYERS: And you'd have been a band 5 nurse at that point?

LETBY: That's right, yes.

MYERS: And when you started in January 2012, what levels of babies would you be qualified to care for?

LETBY: So at that time, when you first qualify, you're only able to look after special care and high-dependency babies.

MYERS: We're familiar with the unit and the nurseries. Which are nurseries the special care and the high-dependency babies would be in?

LETBY: Predominantly nurseries 3 and 4.

MYERS: Right. During the time that you worked on the neonatal unit, was there a system where you continued training and attended courses?

LETBY: Yes, you continue training throughout your career, really.

MYERS: How much did you value being a nurse?

LETBY: Oh, massively, it was everything.

MYERS: And caring for babies?

LETBY: Yes. And I always strived to go on every course possible, to try and be the best that I could.

MYERS: Did you ever play a part in training or helping to guide other people who wanted to be nurses?

LETBY: Yes, I did, yes. Part of my role would be to support further junior band 5s coming into the unit and I was also a mentor for student nurses at the university as well.

MYERS: Just so we understand a little bit more, what does being a mentor for student nurses involve?

LETBY: You undergo a mentorship qualification. So I went to the university and completed a mentorship module, which means then when student nurses come to the unit you are then their sole mentor, they work with you, you're responsible for their paperwork and their competency assessments.

MYERS: Did you become a mentor?

LETBY: I did, yes.

MYERS: When did you qualify as a mentor?

LETBY: Um... I think it was fairly early on in my career. Perhaps 2012 it would have been.

MYERS: Just remember dates as best as you can. No one is expecting every detail to come to mind. Fairly early on is when you recall.

How did you feel about working with students when they came on?

LETBY: I really enjoyed that aspect.

MYERS: Do you know how many you acted as a mentor for?

LETBY: Across the whole time frame?

MYERS: Yes, over the years you worked there.

LETBY: Probably five or six.

MYERS: We saw when we were dealing with the case of [Baby O] and [Baby P], there was a student nurse called Rebecca Morgan who was with you.

LETBY: Yes.

MYERS: Was that part of the mentorship scheme?

LETBY: Yes.

MYERS: What sort of things would she be doing whilst she's with you?

LETBY: So she would be undergoing a lot of the care for the baby under my supervision and with my guidance.

MYERS: And where is she when she's doing that in relation to you, Ms Letby? Where would she be?

LETBY: It would depend on the sort of stage of their training that that student was at. But usually they're directly with me, they would be under direct supervision.

MYERS: That's training of other people and being a mentor with them. I asked you about training that you could undertake. I'm going to ask you about something we've heard of now and we're familiar with and that's QIS, qualification specialty.

LETBY: Yes.

MYERS: What does that mean once you get your QIS?

LETBY: That means then that you are qualified to look after intensive care babies.

MYERS: Right. Does that mean it covers all levels of care for babies?

LETBY: At that point you can then care for any level of care that's needed, yes.

MYERS: And you got your QIS did you?

LETBY: Yes.

MYERS: Which meant that you could look after intensive care babies?

LETBY: Yes.

MYERS: What did you have to do to become QIS authorised or qualified, whatever the terminology is?

LETBY: It's a university module that involves lectures, various assessments, both written assignments and practical assessments, and then I did a placement at Liverpool Women's Hospital, which is the level 3 unit, and that's where you get the hands-on clinical experience in intensive care.

MYERS: When did you start the training for this QIS?

LETBY: I think it was towards the end of 2014.

MYERS: Right. How much time does it take to do the training and then be qualified in specialty?

LETBY: Around, I think it's around 6 months.

MYERS: Do you recall when it was that you would have been qualified to then start looking after intensive care babies?

LETBY: I think it was around the March/April time of 2015.

MYERS: And the period we're looking at in this case is from June 2015 approximately, around that period?

LETBY: Yes.

MYERS: So you were QIS by March/April 2015?

LETBY: Yes.

MYERS: And that meant you could then care for the sickest babies on the unit, is that correct --

LETBY: Yes.

MYERS: -- or those requiring the most intensive care?

LETBY: Yes.

MYERS: Had all the nurses on the neonatal unit got their QIS?

LETBY: No.

MYERS: Do you recall who did have it at your level in terms of band 5s?

LETBY: At that time there was myself and one other band 5 nurse that had the QIS training.

MYERS: Who was that one other band 5 nurse?

LETBY: Bernie Butterworth.

MYERS: Whilst we go forwards in the period we're looking at, did any other band 5 nurse get QIS whilst you were still on the unit?

LETBY: Shelley Tomlins.

MYERS: And the band 6 nurses, they will be QIS?

LETBY: They are, yes.

MYERS: So at the time we're looking at we've got the band 6s who are QIS. Who are the shift leaders, what band of nurse?

LETBY: That's always a band 6.

MYERS: Of the band 5s, you and Bernadette Butterworth were QIS?

LETBY: Yes.

MYERS: And Shelley Tomlins became QIS?

LETBY: Yes.

MYERS: QIS. If you are QIS, what does that mean about the type of work you're given on the unit?

LETBY: Predominantly you're allocated to the high-dependency or intensive care babies. Because of the skill mix on the unit it tends to be that you have two bands 6s, a high grade band 5, and a lower band 5 who doesn't have the intensive care course.

MYERS: If we pause there a moment. You said "because of the skill mix"; what are you talking about, the skill mix -- you say you have two band 6 --

LETBY: Usually generally on a shift you would have two band 6s, one of which would be supernumerary and in charge, then you'd usually have a QIS band 5, like myself, and then a non-QIS trained band 5 member of staff with nursery nurses.

MYERS: Over this period, June 2015 to June 2016, how much of your work, if you can just describe this, would have been the intensive care work, intensive care babies or maybe --

LETBY: That's predominantly what I did for that period of time.

MYERS: And why would you predominantly or your time predominantly be allocated to that? Why would you be selected for that?

LETBY: So partly it would be that that's how the skill mix on the unit would work, so we did have a lot of intensive care babies at that time --

MYERS: Right. Let' just go though this: a lot of intensive care babies?

LETBY: Yes.

MYERS: So there's a need for intensive care trained nurses?

LETBY: Yes.

MYERS: Right. What about the fact that you'd just qualified in specialty, what did that mean about you?

LETBY: So when you complete training, the unit is quite proactive in putting that training to use. You are the most up-to-date member of staff at that point, obviously you've brought clinical skills back from a tertiary centre, so predominantly you do tend to look after those babies to develop your skills and to bring those skills to the unit as well for other people to learn from.

MYERS: When you talk about the skill mix and who's doing what, did you always have enough QIS band 5s to cover everything that needed to be covered in terms of the babies?

LETBY: No, not to meet the correct guidelines, no.

MYERS: Which guidelines are those?

LETBY: The BAPM guidelines.

MYERS: How flexible were you able to be with requests to work when called upon?

LETBY: I was very flexible. At that time I was living in hospital accommodation on the site. I didn't have a family or any commitments myself, so I was very amenable and flexible to changing shifts last minute or doing overtime and extras as needed.

MYERS: We'll have a look at where you were living in due course, but even when you had a house of your own did you cease being as flexible as that or did you remain flexible?

LETBY: No, it was the same.

MYERS: How much did you enjoy the intensive care work?

LETBY: I did enjoy it. That was my... That was kind of my passion for that area. I enjoyed all aspects but I did enjoy the intensive care side.

MYERS: Did you make it clear to the nurses who were allocating nurses to babies that that was where your interest or enjoyment lay?

LETBY: Yes, and I think all nurses on the unit have an area in some way that they prefer or excel at than other areas. So yeah, the staff knew that I enjoyed that area and that was where I was most happy.

MYERS: Did you ever say that other areas of work were boring?

LETBY: No, because no aspect of my work was ever boring.

MYERS: We heard evidence from a nurse called Kathryn Percival-Calderbank who said on one occasion at least that there'd been a debate with you or an argument as to where you should be working and you made it plain you wanted to work in intensive care, although you did go where she asked you to go as it happens. Did you get involved in an argument with Kathryn Percival-Calderbank, as far as you can remember, about that?

LETBY: I have no recollection of that, no.

MYERS: Do you recall getting in arguments with anyone about where it was you should be working?

LETBY: No.

MYERS: Did you make your feelings clear about where you preferred to work?

LETBY: Yes. As I say, I think everybody on the unit would know who preferred working in different areas. So yeah, staff knew that I'd recently done my QIS training and therefore enjoyed being in nursery 1 to develop those skills, yes.

MYERS: I'm going to ask you next a little bit about the paperwork and some of the tasks you deal with on the unit. My Lord, I will do that over the next 10 minutes or thereabouts, if I may, if that's suitable to the court, and then find a place to stop?

MR JUSTICE GOSS: I'll leave it entirely up to you, Mr Myers --

MR MYERS: Thank you.

MR JUSTICE GOSS: -- and then I'll say something to the jury then about how we're going to follow the procedure thereafter.

MR MYERS: Thank you, my Lord.

For the nursing staff, what's the principal or what was the principal system for recording an account of what had taken place when looking after a baby at the time we're looking at?

LETBY: So it would be the electronic nursing notes.

MYERS: Right. Is there a name for that system?

LETBY: It's called the Meditech system.

MYERS: Is that the system which generates the notes that we've looked at where you see a date and a time --

LETBY: It is, yes.

MYERS: -- and usually initials?

LETBY: Yes.

MYERS: All right. So to go on to that system, where are the terminals in the nursery or where do you go to get onto that system?

LETBY: There is a computer based in nursery 1 and then the rest of the computers are outside, around the area of the nurses' station. There's several computers around that area.

MYERS: Can a nurse who wants to put an entry on the system use any one of those terminals?

LETBY: Yes, they can.

MYERS: So if you're going to use a terminal to put a note, what do you do? You walk up to it and then what?

LETBY: So every member of staff has specific log-in details. That enables you to log on to the system and that then produces, as we've seen, the initials for any medication or any note that you then put on to that system.

MYERS: And are you able to make notes as events happen, as they go along, or is that not always possible?

LETBY: No, so usually the notes are sort of the last thing that we would do after the patient care. So they're usually written retrospectively and cover a large period of the shift in one note.

MYERS: If they are written retrospectively, we've seen a lot of them with varying amounts of detail, but sometimes quite a lot of detail, how do you, or other nurses, how do you keep in your mind the detail that's going to go on that note?

LETBY: Part of it would come from the paper documentation that's filled in throughout the shift. And it would also be notes that I would make myself on the back of my handover sheet of things that had happened throughout the day that I knew I needed to document.

MYERS: When you go on to a shift, for instance start working a shift, would you pay any attention to notes that other nurses have written for that baby at an earlier shift or other shifts?

LETBY: Yes.

MYERS: What would you do with regards to that, if you're able to?

LETBY: At some point it would always be advisable that you would go through the previous notes, certainly for the preceding couple of days anyway, paper notes and nursing notes.

MYERS: I'm going to go to various notes or charts as we're looking at this section of your evidence, just by way of example. We'll go to the particular children when we go through the allegations. But just to illustrate something I'd be grateful if we could put up tile 40 from the [Baby I] 3 sequence.

If we go behind that, I just want to identify something here and actually look at the note itself. Thank you.

It's a matter for you, ladies and gentlemen, whether you track what we're doing on the iPads, but you'll see with this bit we will be moving around a number of them by way of illustration. It may be when we come to the allegations it's easier it follow through on the particular sequence of events, but it'll come on the screens anyway.

If we just look at the lower entry, where it begins "addendum 14". About the centre of the page on the right-hand side. Thank you.

Just so we can see the way this is set out -- I'm not going to read all of it. This has got 14 October at 08.43 and this relates to [Baby I] for that day.

LETBY: Yes.

MYERS: It says "written in retrospect". So for example where would the information have come from at 8.43 to write this in retrospect?

LETBY: That would come from any medical notes that had been written and then the paper charts that had been completed throughout the shift, such as like the obs charts, fluids charts, and then any notes that I may have made myself on paper.

MYERS: As far as you know, is the making of notes on paper so you can add things retrospectively unique to you or is it something other nurses do as well?

LETBY: No, it's something we all do.

MYERS: So this is the note at 08.43 and then if we go to tile 41, please, and just pop into this one and go into the actual note.

Scroll down, thank you, just on the left-hand side, if we enlarge that.

We've got 13 October, 21.53. It says "family communication" above it; can you see that?

LETBY: Yes.

MYERS: There's another note, 14 October, 08.45?

LETBY: Yes.

MYERS: What does the section with family communication relate to when we're dealing with the notes of the babies?

LETBY: So we have two sections of notes. We have nursing notes which are clinical care based, and then the family communication notes are specifically related to any interactions that you've had with the parents. So they're separate, they're clinical notes and then these are more family notes.

MYERS: So there are two separate sections in the notes that are used for that?

LETBY: Yes, there are, yes.

MYERS: Thank you, Mr Murphy. We can take that down.

With regard to taking down notes as events happen, writing them down to write them up later, if you do write them down on a piece of paper what would you do with that piece of paper once you've written up your formal notes?

LETBY: So ideally, the paper should be discarded.

MYERS: And where should it go?

LETBY: There's a confidential wastebin on the unit.

MYERS: If you have had paper with you to note up as you're going around during the course of a shift, where would you keep it during the shift?

LETBY: So it would be in our pockets in our uniform.

MYERS: Where does your uniform go at the end of the shift?

LETBY: It goes home with me.

MYERS: Right. We know in your case, Ms Letby, there's a number of handover notes that the police recovered from your property when they came, isn't there?

LETBY: Yes.

MYERS: We'll come to that in a bit, but do you agree that there was a substantial number of handover notes you had that didn't end up in the confidential waste?

LETBY: Yes.

MR MYERS: We'll come to that in a bit.

My Lord, that's probably the appropriate time to take a break if we could. I can press on for --

MR JUSTICE GOSS: Another 5 to 10 minutes? I think Ms Letby seems to be coping well at this stage, so we will just carry on. Another topic. If you just break off when you want to and I'll explain. Otherwise, we get slippage.

MR MYERS: Ms Letby, still following through with the notes, when we're looking at the timing on nursing notes, let's say for instance notes within the body of the Meditech notes, so you're describing what's happened at various times --

LETBY: Yes.

MYERS: -- how accurate is that going to be or is it impossible to say?

LETBY: How accurate would the notes be?

MYERS: Mm.

LETBY: They would be as accurate as possible at that time.

MYERS: When it comes to prescriptions, the electronic printouts of prescriptions, how accurate are the timings on those?

LETBY: Prescriptions and medications, they would be exact, they would be to the minute, whereas the nursing notes would be a more generalised timing.

MYERS: We're going to have a look at some of the notes because I have some questions for you. Again, I'm identifying notes by way of example at the minute. When they're relevant to the particular babies, we'll look at that as we go along. The first one I'd like to look at is the observation chart -- it's one of [Baby O]'s observation charts and it's at tile 18.

Ladies and gentlemen, most of these are in paper if you want to follow them, and I will tell you where they are in the paper bundles, but the will also be on the screens. Some of them may not be on the system, so we may have to go to the paper anyway.

If we just open this up, thank you. For those of you wanting to look at the paper it's behind the [Baby O] section, which is tab 20, page 23658.

Whilst we're looking at this -- can we pull out, Mr Murphy, so we can just see the sheet in general to start with, please? Tile 18 on the screens and page 23658 behind tab 20.

I'd like you to tell us, Ms Letby, where observations are being recorded relating to heart rate, respirations and temperature, what do you actually do as part of this check and filling in this chart? Literally, what happens?

LETBY: Okay. So the observations would be taken at the baby's cot side. The heart rate and respiratory rate would be taken off the monitors. And then the temperature is done manually -- we don't do that every hour, but if we're doing a temperature that is done by manually putting a probe under the baby's arm. Then the rest of the observations, like saturation levels, are taken off the monitor.

MYERS: Right.

LETBY: The same as there we've got the humidity and temperature of the incubator.

MYERS: Let's be clear what you have -- when you say the humidity and temperature of the incubator, can we look at the lower half of the chart, please, Mr Murphy. So we've seen at the top, heart rate. Is that on a monitor?

LETBY: Yes.

MYERS: And respirations, is that on a monitor?

LETBY: Yes.

MYERS: Temperature? That's recorded, is it?

LETBY: Temperature is done manually. So that's not on the monitor.

MYERS: Right. Temperature is manual. Then you were talking about humidity and something else?

LETBY: Yes. So where we've got there, "Cot incubator temp" --

MYERS: That's the top line?

LETBY: Yes. That's where we would document the temperature of the incubator and if there was any humidity within the incubator, and that's a reading that's taken from the incubator itself.

MYERS: All right.

MR JUSTICE GOSS: So that is permanently displayed, the temperature?

LETBY: It is, yes.

MR JUSTICE GOSS: So you just say, "That's the temperature at that time", and you just note that down at the cot or the incubator, whichever it is?

LETBY: Yes.

MR MYERS: Are you able to say how long it would take to do this part of the checks that you're doing?

LETBY: If you're doing observations that are purely like these, it would be a couple of minutes.

MYERS: Right. We know, if we look at the top of the chart and we have a look at the top and then the signature at the bottom, if we look at the top of it for the entry at 13.30, please, if we look at that and look at the signature at the bottom. At 13.30, with the various entries between it, it has got a signature at the bottom. Can you help us with whose signature that is?

LETBY: That's mine.

MYERS: That's yours, all right. So LL, like that, is you; is that right?

LETBY: Yes.

MYERS: Are you meant to sign off when you've done readings or tests or taken observations?

LETBY: Yes. So ideally, anything that you document should have a signature next to it, yes.

MYERS: Does it ever happen that you end up not signing something that has been documented by you -- sorry, that's been observed or checked by you?

LETBY: Yes. So in the reality of a busy day shift or night shift, then a signature may get missed, yes.

MYERS: Is that something that from your knowledge of these charts happens sometimes with other nurses as well?

LETBY: Yes. I would say it happens to everybody. It's just due to busyness.

MYERS: So for example, if we look at the entry to the left-hand side of the 13.30, the 12.30 entry, on the chart itself there are various readings marked, but there's no signature there. So what's happened there, are you able to tell us?

LETBY: So the observations have been carried out and just unfortunately somebody hasn't gone as far as signing the chart.

MYERS: In fact, going left, what's RMSN for on this particular day?

LETBY: RM are the initials of Rebecca Morgan, the student nurse, and SN reflects that student nurse.

MYERS: All right. Anyway, insofar as there isn't a signature under 12.30, is that something which is sinister?

LETBY: No, not at all.

MYERS: If we look, please, at the page on the paper bundle before this, it's page 23657, and on the sequence of events, Mr Murphy, it's tile 15. If we pull out, first of all, just to look at the chart in general for those of us who aren't looking at it on paper. Those are observation charts for [Baby O] on 21 June. We can see, if we look at the bottom, even from this size, signatures in the boxes, can't we?

LETBY: Yes.

MYERS: If we look, please, at the timing for 04.00, top and bottom, that's 04.00, there's a gap.

LETBY: Yes.

MYERS: Any of the signatures here your signature?

LETBY: They're not, no.

MYERS: Is there anything sinister or strange about the fact that whichever nurse took those readings, he or she didn't sign off at the bottom of the column?

LETBY: No, not at all. So all the information is there, they just haven't initialled, which is something that's quite often done through clinical care.

MYERS: All right. If we move two pages forwards in the paper file to 23659, I'm afraid there doesn't appear to be a file for this, 23659. We might have to look in the bundles, ladies and gentlemen.

LETBY: Do I have that?

MYERS: Yes. If you look in the bundles, Ms Letby?

MR JUSTICE GOSS: It's the second bundle. It should have a 2 on the spine. I think that might be the interviews.

MR MYERS: It's on the screens, ladies and gentlemen.

I'm grateful to Mr Murphy for finding that. But this is the next one of two in the paper. This type of chart, intensive care chart, if we look at the right-hand side for 19.00 hours, on 21 June, again there's a signature that appears to be missing.

LETBY: Yes.

MYERS: Is your signature any of those signatures on the right-hand side?

LETBY: No.

MYERS: Is there anything odd or strange about the fact that the nurse designated or caring for [Baby O] didn't sign off on those observations?

LETBY: No, not at all.

MYERS: If we just pull out, please, just to look at this chart, if we may, Mr Murphy.

We've seen a variety of these charts, some with greater or lesser detail on them. What type of checks would the nurse be doing for the items that might be put into this side? For instance, dextrose or aspirations.

LETBY: So this chart is the reading of any drips that are going through, so any fluids or medications that are running. Those values are all taken off the pump itself and then to the right-hand side, the other columns are if we've done a nappy change or if their NG tube has been aspirated.

MYERS: So depending on what the baby needs, how quickly might a nurse deal with the type of tasks that appear in this chart? If it's a very quick one without much being done.

LETBY: If it was purely just reading the values, then it would be minutes.

MYERS: And if it involves the other end of the scale, feeding or nappy changes, how much longer would that be if it's possible to say?

LETBY: It's hard to put a time frame on, but that would be considerably longer.

MYERS: Right.

MR JUSTICE GOSS: So this is just looking at the pump, looking at the gauge on the pump and seeing how much has gone through at a particular time?

LETBY: It is, yes.

MR JUSTICE GOSS: So for example at entry 19, which doesn't have any initials --

LETBY: Somebody has read the rate of the pump and how much fluid has gone through at that point.

MR JUSTICE GOSS: Exactly.

LETBY: And the zero is just a visual thing that the line is still patent and running.

MR JUSTICE GOSS: Right.

MR MYERS: Thank you, my Lord. If we just conclude this section, please.

If we go to page 24311, which is in the [Baby Q] section, so it's behind divider 22 for those of you looking at it in paper and it's page 24311. I don't have a tile number for that. This tile doesn't feature on the sequence of events, as I recall, although we have had evidence on it.

MR JUSTICE GOSS: It's page 3B in the top right-hand corner.

MR MYERS: Thank you.

If you just go to divider 22. It's on the screen as well. You'll find page 3B at the top, 24311 at the bottom. If we just

enlarge, please, the lower part of the right-hand side of the chart.

This relates to care by a nurse called Tanya Downes, who looked after [Baby Q] on 23 June 2016. If we look down at the bottom, 24.00, there's various readings there. If we move across, there's no signature at that point.

LETBY: No.

MYERS: But in terms of readings, the type of things we've here, are you able to say, for instance, how long it would take for a nurse to deal with taking these readings and looking at the baby in this situation?

LETBY: So that would be minutes because you're purely reading from the pumps and the monitors around you.

MYERS: And again, in terms of the signature being missed, anything strange or striking about that?

LETBY: No.

MYERS: Right. That's something that happens from time to time?

LETBY: It is, yes.

MR MYERS: We can just pause there and we will move on to a different chart after the break.

My Lord, if we may, could we take a break at this point?

MR JUSTICE GOSS: Yes, certainly.

You'll know that we conventionally have a ten-minute break. We're going to have a 15-minute break now. So we'll resume again at about 11.55. Then we'll do another hour or thereabouts until 1 o'clock. Then we'll do another hour or thereabouts, then a break, then a second hour. You've heard that the defendant has a long day and she's obviously going to be in the witness box for some time, so it's so that there can be appropriate breaks for everyone in relation to it. So 15 minutes then, please, members of the jury.

(In the absence of the jury)

MR JUSTICE GOSS: Could I ask members of the public, please, to leave the courtroom now? You'll be told when to come back in in 15 minutes. Thank you very much.

Unless anyone suggests otherwise, that I propose is the procedure that we have --

MR MYERS: Very well, my Lord.

MR JUSTICE GOSS: -- for the start of the court and the end of a session, so at five to we'll start again.

MR MYERS: And with the comings and goings, that will fit with approximately about an hour each time for the evidence.

MR JUSTICE GOSS: Exactly, I think that will fit in appropriately. Thank you very much.

(11.43 am)

(A short break)

(11.55 am)

(In the presence of the jury)

MR MYERS: Ms Letby, remaining still with the various tasks of nursing staff when dealing with cares and observations, with regard to feeding babies, feeding them milk, if a baby is receiving milk via the NGT, the nasogastric tube, maybe no more than a millilitre or a couple of millilitres, what does that process consist of from getting ready to doing it to actually delivering the milk to the baby?

LETBY: So your first step would be to get the milk prepared, so the milk would come out of the fridge, be measured out and warmed.

MYERS: Where does that take place, the measuring out and the warming?

LETBY: The milk is kept in the milk room, which is a room on the unit, and then the milk is drawn up at the sort of cot side in that nursery.

MYERS: Right. Where is it warmed?

LETBY: In the nursery.

MYERS: Okay. So it's been drawn up, it's been measured, warmed; what happens next?

LETBY: So when the milk is ready then you would then be able to go and start the tube feed, so you would aspirate the NG tube

first by attaching a syringe and drawing back a small amount to test then the acidity of the contents.

MYERS: Pause there for a moment. The first thing is to aspirate it. We've heard about testing the acidity of the contents because, of course, the tip of the tube should be in the stomach.

LETBY: Yes.

MYERS: Are the whole stomach contents aspirated every time that process is carried out?

LETBY: No.

MYERS: Once that's been done, once the pH has been tested, what happens next?

LETBY: The syringe is connected to the nasogastric tube and the milk is poured into that and fed by gravity, so you would then just hold the syringe and wait for the milk to go in.

MYERS: If it's just a couple of millilitres that are being fed that way, how long would that part of it take, the feeding?

LETBY: That may only take a few minutes.

MYERS: We know with some of the bigger babies they may be up to things like 40ml via the NGT.

LETBY: Or more than that.

MYERS: The same process is gone through in terms of preparing that milk for feeding, is it?

LETBY: It's exactly the same process but the actual time it would take would be longer because obviously you're gravity feeding a lot larger volume -- so the larger the volume the longer the feed would take.

MYERS: Are you able to help us with how long it might take for 40ml to be fed via the NGT?

LETBY: Um... About 10/15 minutes. Again, it would be dependent on the baby, but...

MYERS: Right. Is it done in little amounts or does it all go in at once?

LETBY: No, you have a 10ml syringe attached to the tube, so it would be given 10ml at a time.

MYERS: Right. If it's a baby who can be bottle fed, people may have different experiences in their own lives of this, if it's about 40ml by a bottle, how long would you expect that to be for a baby to receive that?

LETBY: Again, it would be dependent on the baby, but a bottle feed would take considerably longer than a tube feed, particularly as a lot of the babies are premature, so they are slow to feed and have difficulties feeding orally.

MYERS: So do you say maybe 10 minutes plus to get 40ml down the NGT?

LETBY: Yes.

MYERS: Longer for a bottle?

LETBY: I would say up to half an hour for a bottle feed.

MYERS: For a 40ml bottle feed?

LETBY: Yes.

MYERS: We may still, those who have the paper files open, have them open at [Baby Q]. I want to ask about blood gas next, just looking at these various tasks. [Baby Q] is behind divider 22. The blood gas reading is page J24326 at the bottom. Tile 79 for [Baby Q]'s sequence. We'll have it in various places, ladies and gentlemen, but for those of you with paper it's actually -- at the top right it says 008 on paper, at the bottom 24326. It's also on the screens as well.

Again, this is just by way of examples. I'm going to look straight at the top, actually, the top two entries for [Baby Q] for 22 June, so we can follow what's happening.

The entry for 06.00 has a C. We know that means capillary.

LETBY: That's right.

MYERS: I'll check we're all there.

What's the process for a capillary blood gas test? Talk the jury through, if you would, who does what and how long that takes.

LETBY: Okay. A nurse would gather the equipment that's needed to take a blood sample. We'd then wash our hands, go over to that baby, and then a member of staff then would physically carry out the blood gas, so causing a prick on to the heel, and putting the blood into the gas tube.

MYERS: What is that, is that a little test tube?

LETBY: It's like a small -- yeah, a very small tube.

MYERS: The blood goes in there?

LETBY: It does.

MYERS: And here does it go then?

LETBY: Usually a second member of staff would then would what we call run the gas. So they take the gas to the gas machine, which is outside of the nurseries, and usually that's another member of staff that would do that and bring back the printout result and fill in the chart.

MYERS: Pause there a moment now. We'll go back over that. You said another member of staff would go and run the gas?

LETBY: Usually, yes.

MYERS: Could that be the same person that took the heel prick or would it always be a different one?

LETBY: It's usually a different nurse because the person that has taken the heel prick would stay with the baby and obviously stop the bleeding and we put a plaster on and things like that and settle the baby because it's a painful procedure.

MYERS: So there should be two nurses involved in this?

LETBY: Usually, yes.

MYERS: Usually, all right. One of them remains with the baby after the sample's been taken?

LETBY: That's correct.

MYERS: The other one goes and takes the blood gas to where, precisely? Where do they go?

LETBY: The blood gas room is a small room that's just in front of the neonatal entrance doors.

MYERS: I wonder if we can just put up the plan.

LETBY: It's away from the clinical area.

MYERS: Let's see if we can find the plan for this so we can see where exactly the blood gas room is.

If you explain to us where blood gas machine is, please, Ms Letby, and then we can go back to the readings.

LETBY: Can I use the mouse?

MYERS: If it's connected and will work, yes, please do.

LETBY: The blood gas room is just here (indicating).

MR JUSTICE GOSS: Where it says "blood gas"?

LETBY: Yes.

MR MYERS: Yes, I am happy with that.

LETBY: So at the entrance to the unit, it's just down the corridor from nursery 1.

MYERS: So not through any locked doors for that --

LETBY: No.

MYERS: -- straight down there?

LETBY: Yes.

MYERS: Any other blood gas machines that are used elsewhere by nurses from the neonatal unit?

LETBY: The only other blood gas machine is on labour ward, so occasionally if our machine was broken then we'd potentially use the one on labour ward.

MYERS: The blood gas having been run through the machine, we've seen little printouts, like receipts that you get --

LETBY: Yes.

MYERS: And the nurse will go back with that receipt?

LETBY: They would, yes.

MYERS: Thank you for showing us the map, Mr Murphy.

I'll go back now, if I could, to the blood gas chart that we were looking at at tile 79 for [Baby Q] --

MR JUSTICE GOSS: Sorry, just before we leave that, below the word "neonatal" is another blood gas room on this.

LETBY: That's not correct.

MR JUSTICE GOSS: That's not correct?

LETBY: No.

MR JUSTICE GOSS: So ignore that.

MR MYERS: Thank you for clarifying that.

They are everywhere when you start looking for them there, but it's the one at the bottom of the plan?

LETBY: It is, yes. There is only one machine on the unit.

MYERS: If we go back to tile 79, page 24326. The nurse comes back and then who would enter this into the chart, the nurse who'd been with the baby or the nurse who had gone off with the baby, or is there no hard-and-fast rule?

LETBY: It potentially could be either person.

MYERS: Right. If we look at the one below that it looks like it might be a V, it's a little hard to tell because there's a V and it looks like it's over the C, do you see that, the second line down?

LETBY: Yes.

MYERS: But if it is a venous sample, can you help us with what's the difference between the process there and the capillary sample?

LETBY: So a venous sample is done by a doctor, so that's not something that nursing staff can do. That is done through the doctors taking blood from an actual vein, so therefore it would be the doctors that take that sample and then a nursing staff member would then take that to the machine.

MYERS: Right. Thank you. We have finished looking at those. The next item I'd like us to look at, just to get an idea of how long things take and how the activities work on the unit, is an example from the neonatal reviews. So I'm going to ask if you could have a look, please, Ms Letby, at the neonatal review for [Baby B]. For those of us who have it in paper it might be helpful to have this. I don't know if there's a paper neonatal review for you to look at, Ms Letby. It can be put on the screen if there isn't.

We're going to go to page 2 of 7 from the [Baby B] neonatal review. We're going to go through or look at a number of entries

on this page and the next page just to illustrate a couple of matters. We can start at the top of the page and maybe just the top third of the page so we can see it more clearly, Mr Murphy.

We're taking in there lines 1 through to 12. We're not going to all of these, just some of them.

If we look at lines 1 and 5, for example -- let's start with line 1: 9 June 2015, 20.45, a baby with the name HM, and it says:

"Weaning change. Lucy Letby."

So HM isn't one of the babies on the indictment. First of all, where it says 20.45, a time like that, is that going to be a precise time?

LETBY: No, so that would be to sort of the nearest.

MYERS: The nearest?

LETBY: Quarter of -- yes, quarter to or quarter past or on the hour, yes.

MYERS: If we go to line 5 and we've got for EB, the baby you're looking after there, at 21.30, the observation chart, and we know the intensive care observations, we've just been looking at it. 21.30 it says, do you see that --

LETBY: Yes.

MYERS: -- with you taking those observations?

LETBY: Yes.

MYERS: Is 21.30 going to be a precise time?

LETBY: No. So 21.30 would be the time that that would be started usually, so obviously there's a feed there and observations taken --

MYERS: Right.

LETBY: -- all around sort of that time.

MYERS: So when you say there's a feed there, are you now pointing to what's in line 6 under line 5?

LETBY: Yes.

MYERS: Because we can see at the same time, 21.30, on the neonatal feeding chart, "Feed given", and you.

LETBY: Yes.

MYERS: "Feed given and observations taken."

Are those two different things that have happened?

LETBY: They are, yes.

MYERS: Have they both happened at precisely 21.30?

LETBY: No.

MYERS: So when you put in 21.30 there, what sort of period is that covering?

LETBY: It's usually done to sort of the nearest, either on the hour, the quarter past or half past the hour. And that's usually the time around when something has started.

MYERS: So is that precision timing for those?

LETBY: No, it's not, no.

MYERS: If we look at lines 1 and 5 we can see that at 20.45 you are engaged with something with baby HM and it says "weaning change". And 45 minutes later, on the timings, at line 5, there's observations for EB and also a feed for EB. Do you see that?

LETBY: Yes.

MYERS: Forty-five minutes have elapsed between lines 1 and 5. What might be happening in that time when we look in these charts and there's a time lapse on the record for what nurses or you have been doing?

LETBY: So there are lots of things that we would be doing. We would still be attending to alarms for other babies, speaking to parents, there's a lot of equipment checks and things that we need to do. Medication checks. There's lots of jobs to do other than just being at the baby's cot side, writing things.

MYERS: Because the focus in the trial to this point has obviously been on what is happening with the babies.

LETBY: Yes.

MYERS: But in the unit as a whole, are there other tasks during the course of a shift that have to be dealt with?

LETBY: There are, yes.

MYERS: And who decides who's doing what when it comes to those more general tasks?

LETBY: So usually that would be the shift leader. There are set tasks that we have to do on each shift.

MYERS: If we look at the two lines, 7 and 8, as it happens we can see Cheryl Cuthbertson-Taylor at 21.30 involved in a feed being given and observations with two different babies --

LETBY: Yes.

MYERS: -- LG and LT.

LETBY: Yes.

MYERS: Is there anything odd or strange or suspicious in a nurse having two different activities with two different babies at the same time?

LETBY: No. Again, the idea of these charts is that they are sort of an estimated time, they are not to the exact figure.

MYERS: These are two different babies with Cheryl Cuthbertson-Taylor, aren't they?

LETBY: Yes.

MYERS: Anything odd about that?

LETBY: No.

MYERS: If we perhaps look lower down the chart, I'd like to see if we can go to line 24, please, on the lower half of the chart. Thank you, Mr Murphy.

When we come to [Baby B], we'll look at it in more detail, but [Nurse A] was the designated nurse for [Baby B] on this evening.

LETBY: Yes.

MYERS: As it happens, the first we see on [Nurse A] on this chart is at line 24. Can you see line 24?

LETBY: Yes.

MYERS: That is at 22.00:

"Baby JE, intensive care chart, [Nurse A]."

Do you see that, Ms Letby?

LETBY: Yes.

MYERS: The shift starts at what time?

LETBY: 7.30.

MYERS: 7.30. In your experience is there anything odd or strange in the fact that we see no recorded activity for [Nurse A] before 22.00?

LETBY: No.

MYERS: Can we go over the page, please, page 3 of 7 and have a look at lines -- the top half of the chart. It's the period leading up to the [Baby B] event. The first [Baby B] event. Thank you.

If we look at lines 36 and 37, do you see 23.00, Ms Letby? It's [Nurse A] doing observations and cares for [Baby B]?

LETBY: Yes.

MYERS: Both at 23.00?

LETBY: Yes.

MYERS: Then in the period after that, there are medications given, lines 38 and 39, do you see those two lines --

LETBY: Yes.

MYERS: -- at 23.02 for baby HM? We can see Lucy Letby and the co-signer is [Nurse A]. What was the situation in terms of nurses assisting one another on the unit, how important was that?

LETBY: So you have to. Medications are always given by two people. So inevitably you will always be working with another person when doing anything to do with medication or fluids.

MYERS: Was there any fixed rule as to who would assist when assistance was required?

LETBY: No, it would be any member of staff that's free or potentially anybody that's working in the same nursery as you.

MYERS: We'll probably come back to look at other entries as we go along but that's just dealing with the way those entries appear on the charts. We can put those to one side, ladies and gentlemen.

If you cast your mind back to that period, June 2015 to June 2016, Ms Letby, how busy did the unit seem to be?

LETBY: Oh, it was noticeably busier than it had ever been in the previous years that I'd worked there.

MYERS: And was there anything about the babies coming on to the unit that -- you said it was busier, but was there anything about the babies or type of babies coming on to the unit that struck you?

LETBY: Yes, we seemed to have babies with a lot more complex needs that maybe we hadn't cared for on the unit.

MYERS: Is this over that period June 2015 to June 2016?

LETBY: Yes.

MYERS: Was there any change in the staffing levels to take account of that?

LETBY: No, there wasn't.

MYERS: A change in the way the BAPM guidelines were provided?

LETBY: No.

MYERS: Or the number of doctors available?

LETBY: No.

MYERS: If you think about babies like [Baby H], with three chest drains, is that something which had been encountered before in your experience at the Countess of Chester?

LETBY: No.

MYERS: Or [Baby J], who had had the stomas, the surgery for the two stomas. Is that something which was regularly encountered at the Countess of Chester in your experience?

LETBY: No, and the same with the Broviac line with [Baby J].

MYERS: And [Baby N], who we know had factor VIII haemophilia, was that something that you'd encountered in your experience at the Countess of Chester before?

LETBY: No, it wasn't, no.

MYERS: In terms of the shifts that you attended, how many shifts a month did you do? Was there a set number?

LETBY: Yes, so a full-time worker would do 13 shifts a month -- and that could be in any combination.

MYERS: By shift do you mean a 12-hour period?

LETBY: Yes, either a day shift or a night shift.

MYERS: Right. Is there a limit on the most shifts you can do in a row, a maximum?

LETBY: It's usually four.

MR JUSTICE GOSS: Sorry to be pedantic about this, but by month do you mean in any 28-day period or per calendar month?

LETBY: Per calendar month.

MR JUSTICE GOSS: So it will always be 13, even if it was a 28-day month or a 31-day month?

LETBY: Yes.

MR JUSTICE GOSS: All right.

MR MYERS: Would you ever be asked to do more than that?

LETBY: Quite often.

MYERS: More than the 13?

LETBY: Yes.

MYERS: Were you asked to do more than the 13 -- did it add up that you'd been asked to do more than the 13 on some months?

LETBY: Yes.

MYERS: How long in advance did you know when you'd be required on the shifts?

LETBY: So the shifts are usually allocated about a month in advance, but realistically they change on a day-to-day basis to

reflect staff sickness or the volume of babies on the unit, anything like that. So it's something that changes regularly.

MYERS: What's the shortest notice you'd sometimes get in terms of being asked to come onto the unit and do a shift?

LETBY: I've been called at a lunchtime and asked if I can work that night. Sometimes it can be very short notice.

MYERS: And would that be in addition to the 13 shifts in the month that you were already slated to do?

LETBY: It would be, yes, or sometimes they would just move shifts around, so you might end up doing a shift --

MYERS: Would you know which baby you were going to be designated to care for in advance of the shift?

LETBY: No, not at all.

MYERS: So you'd turn up and then find out?

LETBY: Yes.

MYERS: Could you ask for a particular baby?

LETBY: Um... You could if you potentially were doing a run of shifts, so we might try and keep the same baby for continuity of care, but otherwise no it's just dependent on the shift leader.

MYERS: Is continuity of care -- what do you mean by continuity of care, if it isn't obvious?

LETBY: So continuity of care, we try to look after the same babies as much as possible to provide the parents with some continuity in terms of familiar staff and also that the staff get to know the babies and their conditions.

MYERS: And therefore would the shifts ever be arranged, insofar as they could be, to try to maintain continuity of care or is that something which didn't really feature?

LETBY: No, it's something that we strive to do when possible, but obviously it's not always possible to do that.

MYERS: So sometimes then you might know who you're going to be looking after before you went on; is that right?

LETBY: You might potentially, yes --

MYERS: You might potentially?

LETBY: -- particularly perhaps -- if you'd been in the day before or the night before you might know.

MYERS: But generally --

LETBY: No, it would be dependent on what's happened that shift and what staffing you have and what the shift leader allocates.

MYERS: We started with your evidence looking at the effect of how things went for you once we got past July 2016. Can I just ask you to deal with this: in terms of your health over the period that we're looking at, the actual indictment period, were you generally well?

LETBY: Yes.

MYERS: Did you have any particular issues or health problems?

LETBY: No, I didn't, and I hadn't had any time off sick at all.

MYERS: How was your eyesight generally speaking?

LETBY: My eyesight was fine.

MYERS: And did you ever have to have any assistance with anything in relation to your vision?

LETBY: I did, yes. So I did have a condition called optic neuritis at one point.

MYERS: Pause there: optic neuritis, what do you understand optic neuritis to be?

LETBY: It's an inflammation of the optic nerve.

MYERS: What does it cause to happen?

LETBY: It causes pain and discomfort and can cause a bit of blurred vision.

MYERS: When did you have that?

LETBY: Um... That was in 2015.

MYERS: And did you receive any treatment for it?

LETBY: I did, yes. I was under the ophthalmology team at the Countess of Chester and also the Walton Centre in Liverpool, which is a neurology hospital.

MYERS: Pause there: I think earlier in the case there'd been a reference to the Walton Centre and you attending it.

LETBY: Yes.

MYERS: Is that what that related to?

LETBY: It is, yes.

MYERS: And they have a specialist neurology unit there do they?

LETBY: Yes, and I had some investigations there and everything was found to be okay.

MYERS: So no serious underlying condition?

LETBY: No, and it resolved itself.

MYERS: You're not suggesting that in any way your vision was interfered with what we're dealing with in this case are you?

LETBY: No, not at all no.

MYERS: That's just dealing with your health generally?

LETBY: It is, yes.

MYERS: The desperately sad nature of this case is that it involves babies not just who became very unwell but babies who died, and as we go through the evidence I'll be asking you questions about them, and I repeat again what I've said before that I do so with absolute sensitivity, as anyone would have, for those babies and for those parents and families who are bereaved. We have to look at various things in relation to that, so no insensitivity is intended when I refer to any babies in the case.

These are just general questions at this point. We're going to come to the charges as we go along.

When there is a death of a baby on the unit, are you able to describe what the impact of that is on the unit, Miss Letby?

LETBY: It affects everybody on the unit. There's a noticeable change in atmosphere. We're a very small unit, we work very closely together. So when anything like that happens, it does have an impact on everyone.

MYERS: Does everybody on the unit react in the same way when there has been a death of a baby?

LETBY: No, I think with any individual we all have different reactions to different things and different ways of expressing different emotions.

MYERS: What's the main source of support, if there is any, for the staff when there's been the death of a baby on the unit for the nursing staff?

LETBY: So there is nothing formal. It would just be sort of nurses between ourselves supporting each other.

MYERS: I'm going to come to the families in a moment, I'm just asking about nursing staff. Would you or your colleagues ever talk about what had happened outside of work?

LETBY: Yes, we would, yes.

MYERS: Would you ever communicate by messages with one another about what had happened?

LETBY: Yes.

MYERS: How important was that in terms of support for one another when there had been a death on the unit?

LETBY: It was very important. Again, there was no formal sort of support, so we leant on each other.

MYERS: Was there any system of counselling for members of staff who were involved or present at the time of a death or a series of deaths?

LETBY: No, there isn't, no.

MYERS: It's a fact in this case, and something we all have to look at, that you were present on the unit on a number of deaths, on all the deaths on this indictment, weren't you?

LETBY: Yes.

MYERS: What formal assistance did you get with coping with any of that as it went along, structured formal assistance?

LETBY: None.

MYERS: Did being moved to days in April 2016 make a great deal of difference to how you felt with everything that had happened?

LETBY: No.

MYERS: And in fact, did you still continue to work nights after that date anyway?

LETBY: I did, yes.

MYERS: Was there anything that you felt was part of how you would cope -- if you'd been in a nursery and a baby had died there, was there any aspect of what would happen afterwards that you felt would help you to cope?

LETBY: So from my personal experience I found -- at Liverpool Women's they have a very -- how to put it? -- so there you're sort of encouraged that if you lose a baby or a baby dies, you go back into that nursery as soon as possible, as a sort of way of processing things so that you don't sort of ruminate on that one particular baby being in that space.

MYERS: Is that in any way to do with not caring about the baby?

LETBY: No, not at all.

MYERS: What's the reason for going back and --

LETBY: Because you have to carry on and you have to be professional for all the other babies that you're caring for.

MYERS: With the parents of babies, if they suffer a bereavement, if a baby dies on the unit, what kind of support is given to them on the unit at that point?

LETBY: So there is a bereavement sort of guideline that we have, as nurses, which guides us into what we can offer to support the parents. But largely, it's just done between the nursing staff, based on the parents at that time.

MYERS: And what about the way that the nurses are towards the parents? How do they act with the parents and seek to provide any assistance?

LETBY: Well, we're there to support them as much as we possibly can.

MYERS: The bereavement checklist, is that something formal?

LETBY: It is, yes.

MYERS: What's that designed to do?

LETBY: So that's there really to ensure that parents are supported and that memories are made, really, for them and their baby.

MYERS: Who would be the person, as a rule, who would be most involved with the parent after there had been a death, which nurse?

LETBY: Generally it would be the nurse designated for that baby.

MYERS: I'm going to ask actually if we can put up the checklist, which we saw earlier in the case. It's at exhibit page 1141.

This relates to, if we look at the top left, please, [Baby A], born on 7 June 2015, very sadly died on 8 June.

We can see, just looking at that, your signature is present on a lot of the entries. Can you see that, Ms Letby?

LETBY: Yes.

MYERS: Why was your signature present on these entries with [Baby A]?

LETBY: Because I was the nurse allocated to look after [Baby A] at that point.

MYERS: We'll come to it, but we know his death happened soon after the handover on the 8th when you took over from Mel Taylor; is that correct?

LETBY: Yes.

MYERS: If we look at the type of entries here, just looking under "emotional support" if we may, please, it's got items such as, about six lines down:

"Photos taken on NNU camera. Parental consent for photos."

LETBY: Yes.

MYERS: Is that something which was, it seems a blunt word, but offered to parents, they were told they could have that if they wanted?

LETBY: It is, yes.

MYERS: What other sorts of things were made available for parents to help with what had happened, if it could, possibly?

LETBY: So depending on the circumstances, it could be having hand and footprints made, bathing the baby, dressing the baby, taking a lock of hair, having any sort of religious support or baptism, things like that.

MYERS: This is you, we know, because you were the designated nurse at this time. Did other nurses follow the same check list if they were dealing with a bereavement and the death of a baby that they had been designated for care for?

LETBY: Yes, it's a standardised form.

MYERS: And would nurses ever assist one another and the parents during this?

LETBY: Yes, very much so.

MYERS: We've heard reference to something called a memory box; you're familiar with that term?

LETBY: Yes.

MYERS: Could you explain to the ladies and gentlemen, if this isn't clear, what is a memory box?

LETBY: So a memory box is something that's donated by neonatal charities. They contain the things inside to enable to do these things, such as taking hand and footprints, taking locks of hair. It gives you a box to put those sort of memories in for the parents. They also include a little teddy bear, which -- one stays with the baby and one stays with the family. They're things that are all provided by a charity.

MYERS: It's part of a formal process, is it --

LETBY: Yes.

MYERS: -- part of the bereavement process?

LETBY: It is.

MYERS: We can take the chart down, please, Mr Murphy. Thank you.

After the immediate event, in terms of the unit, was there ever a system of debriefing for the people who were involved? This is at a clinical level.

LETBY: Yes. There is usually a debrief of some sort, but that is sort of medical-based rather than...

MYERS: Who would hold the debrief?

LETBY: It would be run by the consultant in charge at that point.

MYERS: Would there always be a debrief after a death?

LETBY: Not always, no.

MYERS: Who would decide if there was going to be a debrief?

LETBY: The consultant.

MYERS: And who would be present at that?

LETBY: So anybody who was present on that shift would be invited to attend, so it's up to that person whether they're free to go or if they want to go.

MYERS: How long after a death would a debrief be held? Was there a standard time?

LETBY: There wasn't, no. It could be days, it could be weeks.

MYERS: What was the purpose of the debrief?

LETBY: Mainly to review sort of immediate medical care at the resuscitation, to see if there was anything that we needed to learn from.

MYERS: You said that people maintained, as best as they could, a professional presentation throughout this.

LETBY: Yes.

MYERS: Is that nurses and doctors?

LETBY: Yes.

MYERS: Personally, how did the impact feel? However the presentation was externally, what was the impact personally, if you are able to describe?

LETBY: It was very upsetting. You don't forget things like that. They stay with you.

MYERS: We'll of course return to the system and situation with the babies when we come to the allegations, but I want to move on to another area now and that's actually the area to do with your life at the time you were working on the unit.

You described your commitment to the -- to your profession, Ms Letby, and we have heard some evidence about that. But were there other activities in your life outside work over the period we're looking at?

LETBY: Yes, I had quite an active social life.

MYERS: What sort of things did you do? We may have seen some of it from the messages, but you tell us. What kind of things did you do when you could?

LETBY: I used to regularly attends salsa classes. Used to go out with friends, meet up for lunch. I've been on a quite a few holidays with friends. Gym.

MYERS: Okay. Did you meet up with colleagues from work outside work hours?

LETBY: Yes, I did.

MYERS: Were there any particular colleagues that you were or colleagues that you were particularly friendly with?

LETBY: Yes.

MYERS: Could you tell us who they were?

LETBY: [Nurse E]. Minna Lappalainen. [Dr A]. [Nurse A]. Jennifer Jones-Key.

MYERS: You described at the start of your evidence that when you moved to the non-clinical duties, you were able to have some support from some of those people.

LETBY: Yes.

MYERS: How important to you was that support at that time?

LETBY: Oh, it was very important. They were the only form of support I had, really.

MYERS: [Dr A], who we've seen appearing on various of the texts, when did you first get to know who he was?

LETBY: Um, so he started on the unit around September 2015 as a registrar.

MYERS: We've seen the texts.

LETBY: Yes.

MYERS: How did you get to know one another?

LETBY: Just through working together and then at times we would then start to meet socially as well.

MYERS: Was it a friendship?

LETBY: It was, yes.

MYERS: Anything more than a friendship?

LETBY: No.

MYERS: A close friendship?

LETBY: Yes, he was a trusted friend, yes.

MYERS: Did you ever meet outside hospital?

LETBY: Yes, we did.

MYERS: We've seen that you got a lift back after you'd had a needlestick injury --

LETBY: Yes.

MYERS: -- I think after treatment for [Baby O]. Putting that aside, did you meet outside hospital? You're saying you did.

LETBY: Yes, we did.

MYERS: Where would you meet if you did meet?

LETBY: Sometimes he would come to my house, sometimes we would go out for meals or coffee or walks.

MYERS: Was there a time when he stopped working at the Countess of Chester neonatal unit?

LETBY: Yes. So he finished working there in the September of 2016.

MYERS: Where did he go?

LETBY: He then moved to Alder Hey.

MYERS: Alder Hey Children's Hospital?

LETBY: Yes.

MYERS: He'd been a registrar at the Countess of Chester. Did he remain a registrar when he went to Alder Hey?

LETBY: No, he became a consultant once he moved to Alder Hey.

MYERS: So he's a consultant now?

LETBY: That's right.

MYERS: After he went to Alder Hey in September 2016, did you and he stay in touch?

LETBY: We did, yes.

MYERS: Remain friendly?

LETBY: Yes.

MYERS: And how long did that friendliness continue for?

LETBY: Until the early part of 2018.

MYERS: Then anything in particular happen or did it just end?

LETBY: No, it just sort of fizzled out. It was just -- yeah.

MYERS: Fizzled out, all right. Do you like to message people?

LETBY: Yes.

MYERS: Text?

LETBY: Yes.

MYERS: We'll look at some as we go along. You might not be the only person who does that, but insofar as you do, do you use it for social things?

LETBY: Yes.

MYERS: Work-related issues?

LETBY: Yes.

MYERS: In your experience, how common was it for you and other nurses on the unit to message one another about what was happening at work?

LETBY: Very common. We would all do it at some point, yes.

MYERS: Did you sometimes message when you were at work?

LETBY: Yes.

MYERS: Were you the only person on the unit to do that?

LETBY: No, all staff would regularly use their phones whilst at work.

MYERS: Were there any rules about where on the unit they could use their phones or any practices about where they could use them?

LETBY: Just the general rule would be that you don't use the phone sort of in the clinical areas.

MYERS: In what areas?

LETBY: The clinical areas, so the nurseries.

MYERS: Right.

LETBY: Otherwise at the nurses' station, the equipment rooms, phones would often be used, yes.

MYERS: Nursing station, equipment rooms?

LETBY: Yeah.

MYERS: Where else?

LETBY: Break rooms. Anywhere outside of the nurseries.

MYERS: Where's the fridge with the insulin with it?

LETBY: The fridge in the equipment room.

MYERS: Do people go in there then to use their phones?

LETBY: Yes.

MYERS: Was there any way of knowing when somebody was going to go into the equipment room?

LETBY: No. So that room is a very busy room, it's open all the time for people to come and go and collect equipment. It's also where we would go for refreshments as well.

MYERS: When you say refreshments, what sort of refreshments do you mean?

LETBY: We're not able to have hot drinks in the nursery, so if you were going to get a coffee or something you would then take it into the equipment room.

MYERS: So people go in there to get equipment?

LETBY: Yes.

MYERS: They might go in there to have a hot drink?

LETBY: Yes.

MYERS: They might go in there to use their phone?

LETBY: Yes.

MYERS: At any time?

LETBY: Yes. The door is open at all times, yes.

MYERS: With the families who were on the unit -- is part of neonatal nursing directed towards enabling families to come on to the unit so they can be with their babies as much as possible?

LETBY: Yes, very much so. Part of our role is to make them inclusive (sic) as much as possible with their baby.

MYERS: What hours can parents, for example, visit their babies?

LETBY: It's open visiting, other than the handover time, so sort of the half hour around shift change, just for privacy really of the other babies, otherwise they can come at any point.

MYERS: How well can you get to know parents on the unit?

LETBY: Um... With some families they can be with us for very long periods of time and you get to know them extremely well.

MYERS: By "very long" do you mean weeks?

LETBY: We can have babies for months.

MYERS: Right. Obviously we've looked at the babies in this case who feature on this indictment. But did you have other babies who might be there for weeks or months who were no part of this case?

LETBY: Yes, very often.

MYERS: Would you get to know parents of babies like that?

LETBY: Yes.

MYERS: How close a friendship, if at all, might you have with parents?

LETBY: Um... I think it's only ever at a professional level when they're on the unit. There have been a couple of occasions where I have kept in touch with families once they've been discharged from the unit, but on the whole it's a professional relationship.

MYERS: In your knowledge are you the only nurse who's ever, as you put it, kept in touch with families?

LETBY: No.

MYERS: Is it something you are aware other staff have done?

LETBY: Yes. Once they've been discharged, yes.

MYERS: Do you stop being interested in them the moment they leave the unit?

LETBY: No, definitely not.

MYERS: Have you ever looked for parents of babies on Facebook?

LETBY: Yes, I have.

MYERS: We've seen various Facebook searches in evidence, Ms Letby. You've seen those on the sequence of events, haven't you?

LETBY: Yes.

MYERS: How regular a Facebook user were you?

LETBY: Oh, daily. I was always on my phone.

MYERS: Just for the parents of some of the children on this indictment or other people?

LETBY: No, for anyone that I might meet or come across.

MYERS: Anyone you might meet?

LETBY: Yes.

MYERS: Literally like that?

LETBY: Well...

MYERS: I'm not criticising you, I'm just asking: is it literally anyone you might meet, you would look at them on Facebook?

LETBY: Potentially, yes. Just out of curiosity.

MYERS: So what sort of people would you look at on Facebook?

LETBY: Other colleagues at work. People that I might have met at salsa group. Just... Anybody really.

MYERS: When you've looked at parents of babies on Facebook, is there any reason or reasons why you've done that?

LETBY: I just think general curiosity and they've been on my mind.

MYERS: Have you only ever looked for parents relating to this indictment or other parents of babies?

LETBY: No. I've looked at other parents as well.

MYERS: We're going to look at some material, which is introduced, my Lord, with the agreement of the prosecution. It's a schedule relating to Facebook. I'd be grateful for Ms Clancy's assistance. There's an agreed fact to read and then we'll go to the schedule and go through parts of it with you in front of the jury, Ms Letby.

My Lord, ladies and gentlemen, I'm going to ask that the admission follows on the formal admissions you already have, which are behind divider 3 in jury bundle 1. The schedule will sit just behind this next admission and I'll read it out and we'll have a look at it. You'll need copies of these too, Ms Letby.

(Handed)

The best thing would be, I suggest, ladies and gentlemen, to go behind divider 3 in jury bundle 1, which is where the admissions are, and to put admission 61 in there, which we'll read into the record, and then we'll have a look at the schedule.

We'll start just by reading in agreed fact 61. Have a look at that, please, Ms Letby. It's just underneath the schedule. It says:

"The contents of defence document exhibit D27 entitled 'Facebook searches by Lucy Letby, June 2015 to June 2016' are agreed."

Then if we put the searches behind that, that document is the one that you have. I'm grateful, Mr Murphy. We can follow it on the screen as well. We'll go through some of the entries here if we may, please. I'll read the first part of this. Have you all got that filed away, ladies and gentlemen, where you can see it easily? Thank you.

I'll go through the wording, Ms Letby, and then we'll actually have a look at some of the content, not everything, but some of the content. It is there to refer to. So it says:

"Facebook searches by Lucy Letby, June 2015 to June 2016."

Thank you, Mr Murphy. We'll look at the print first.

"The table below shows: (i) Facebook searches for parents of the children on the indictment (marked in red) for the period between June 2015 to June 2016.

"(ii) Additional Facebook searches made by Lucy Letby for the same period on those specific days where searches are made for parents of children on the indictment.

"(iii) Entries with asterisks explain the category of search that was made by Lucy Letby and preserve anonymity.

"(iv) A monthly breakdown of the total number of Facebook searches made by Lucy Letby between June 2015 and June 2016."

You'll see that at the end of each month, ladies and gentlemen, when we go through it.

In addition it stays:

"It is accepted that throughout the period 1 June 2015 to 30 June 2016, Lucy Letby regularly used Facebook to search for: (i) the parents of children other than those on the indictment; (ii) colleagues on the neonatal unit at the Countess of Chester Hospital, both nursing and clinical colleagues; (iii) social and non-work related matters."

So that's what this schedule is and, Ms Letby, do you follow that?

LETBY: Yes.

MYERS: So it doesn't include, by any means, the entirety of the searches over this period, it includes searches by you in the same period on the specific days --

LETBY: That's right.

MYERS: -- where children have been identified, or parents of children, on the indictment?

LETBY: Yes.

MYERS: So let's just go and have a look through this now, please. Page 1. It may be a lot of me reading parts of this and then asking you questions, Ms Letby. We have on 9 June 2015, 09.57:

"Other mother of child from Liverpool Women's Hospital neonatal unit."

As the jury will understands, so far as possible and appropriate, we haven't gone into the personal details of everybody because privacy is preserved as far as possible with this.

That was followed a minute later by a search for [Mother of Babies A & B], who is [Baby A]'s mother, and then 2 minutes later, by a search for David Harkness. Going back to June 2015, if you can, do you know why you would have been looking at 9.57 for "other mother of child from Liverpool Women's Hospital"? Do you know why you would have been?

LETBY: Just curiosity. They were obviously on my mind at that point.

MYERS: Was it unusual for you to look up the parents of a child that you'd been involved with or cared for --

LETBY: No.

MYERS: -- or at a hospital where you'd worked?

LETBY: No.

MYERS: This is the morning following [Baby A]'s death. Are you able to tell us why it was that you are were looking for [Mother of Babies A & B], his mother, at 9.58 on 9 June?

LETBY: Just that she was on my mind at that point.

MYERS: David Harkness, 2 minutes later?

LETBY: The same.

MYERS: If we carry on that day, we can see there's a number of searches relating to individuals under the category of "social". What sort of people would come under that category? I'm not asking for their names, but how would you encounter people that we're referring to as social?

LETBY: That's friends from school, friends from university, people that I had met through the gym or through salsa a wide variety of people.

MYERS: If you met somebody at salsa, for instance, who you'd not met before, would you be interested to look them up?

LETBY: Yes.

MYERS: You sound definite about that. Is that something you did?

LETBY: Yes, it's general curiosity, I think. I'm of the type where we do a lot on our phones and, yes, I would out of interest look up a lot of people, yeah.

MYERS: And carrying on down that page, 10 June, 21.13:

"Other mother of child from Liverpool Women's Hospital NNU."

So not related to a parent of a baby on this indictment but why would you be looking at whoever that was?

LETBY: Again, it's just curiosity.

MYERS: Going over the page, please, thank you. If we go to the top of the page, we've got, at 23.33 on 10 June 2015, the top entry is for [Mother of Babies A & B], [Baby A] and [Baby B]'s mother. This is later on the day after [Baby B]'s episode. Why would you be looking at [Mother of Babies A & B]?

LETBY: Again, she's on my mind.

MYERS: One minute later, "Other mother of child from COCH". So another mother of a child from the Countess of Chester neonatal unit, nothing to do with this indictment.

LETBY: Yes.

MYERS: What's happened there just 2 minutes later? Why are you looking at someone else like that?

LETBY: Again it's just general curiosity, flicking through a lot of different names at different times.

MYERS: If we skip forwards, not all entries are here for June, but just to look forwards from there, 14 June, a couple of lines down, we've got at 10.20, a mother of a child from Liverpool Women's Hospital. At 15.52, [Mother of Baby C], and at 15.52, also [Father of Baby C], who are also [Baby C]'s parents. Why would you be looking for them?

LETBY: Again, it's just general curiosity.

MYERS: Is it unusual for you to look for people who have crossed your mind for whatever reason?

LETBY: No, I do it frequently. It's just normal behaviour for me.

MYERS: For you?

LETBY: Yes.

MYERS: And we can see, 14 June 2015 at 17.14, "Other mother of a child from Liverpool Women's". Then a few lines down moving forwards 25 June 2015 at 11.42, "Other mother of child from the Countess of Chester".

MR JUSTICE GOSS: Could I just ask, on that page, "Other mother of child from Liverpool Women's Hospital", is that the same mother or are these different mothers?

MR MYERS: Some are duplicated, some are the same mother and some are inevitably different. They're not all different.

MR JUSTICE GOSS: No, but I mean, we can see this -- I'm going to have a few questions about some of these in any event, but just so that we know. So if there is one particular mother that is being asked -- if there is the same other mother of child from Liverpool Women's Hospital, is it that one that's being looked at on Facebook or are these all different mothers?

MR MYERS: No, they're not all different. A number of them repeat, either socially or where it says mother of -- other mother of a child or what have you. But a number of them repeat.

MR JUSTICE GOSS: All right.

MR MYERS: But the underlying information, so your Lordship knows, is available to be used as required by the defence, the prosecution or indeed in answer to your Lordship's questions. But at this point, after careful consideration, presenting it with a minimum of intrusion into people's identity was the way that this was presented.

MR JUSTICE GOSS: Yes. I can understand that. Anyway, I don't want to interrupt you. It was becoming very apparent and I just wondered if it was other mother 1, other mother 2, other mother 3 or something from Liverpool Women's or whether it's other mother 1, 1, 1, again. That's what I'm trying to distinguish.

MR MYERS: Yes, there are repeats and there's some variations.

MR JUSTICE GOSS: All right, there we are.

MR MYERS: If we look towards the end of that day, Ms Letby, we've got searches, after a number of social searches, later in the evening for [Mother of Babies A & B], [Mother of Baby D] and [Father of Baby D], [Mother of Baby D] and [Father of Baby D] being parents of [Baby D]. Any particular reason why you'd be looking for them at that point?

LETBY: No. Again, it's just a pattern of behaviour. They're on my mind. I'm just searching for lots of different people.

MYERS: In the case of [Mother of Baby D] and [Father of Baby D], those searches come within a couple of days of [Baby D] dying. Is that in any way relevant to why they were on your mind at that point?

LETBY: Yes, because it's a significant event.

MYERS: We can see the total number of searches for June: there are 113, of which these are part.

LETBY: Yes.

MYERS: July, 70 searches. Do you see that? We can move on to August 2015. On 6 August, a number of searches, a reference at 12.31 to "mother of a child from Liverpool Women's Hospital"; can you see that?

LETBY: Yes.

MYERS: Then "Team AL" at 12.42? What's Team AL? We don't need the name necessarily but could you explain what "#teamal" was?

LETBY: Um... I'm not sure at the minute.

MYERS: Right. Was the unit ever involved in activities to raise funds for anything?

LETBY: Yes.

MYERS: What sort of things would funds be raised for from the unit?

LETBY: So for equipment for the unit or predominantly to save for the new build, so the unit was recently rebuilt.

MYERS: In terms of Team AL, does that help you with what that relates to?

LETBY: Yeah, I think that's a fundraising page.

MYERS: And AL the initials of a child, I should say, to assist you.

LETBY: Yes.

MYERS: [Mother of Babies E & F] on 6 August 2015 at 19.58. Do you know why you were looking at [Mother of Babies E & F] or searching for [Mother of Babies E & F] on that occasion?

LETBY: No.

MYERS: Or a couple of weeks later if we come some lines down, can you say why you were looking there?

LETBY: No, just that she's on my mind.

MYERS: [Mother of Babies E & F], of course, the mother of [Baby E] and [Baby F].

LETBY: Yes.

MYERS: [Baby F] died on 4 August 2015. That's just to help us with that date.

July 2015. Just go over the page, please. The total number of searches. 175.

MR JUSTICE GOSS: For August.

MR MYERS: I apologise. 175 for August 2015.

MR JUSTICE GOSS: If we could just go back. Where it says for 6 August, 22.25, "Work colleague". Is that a work colleague who's not been named in this case?

MR MYERS: Yes.

MR JUSTICE GOSS: So it's preserving the anonymity of another work colleague.

MR MYERS: Yes, someone who hasn't yet been named.

MR JUSTICE GOSS: I thought it was, but just to clarify that.

MR MYERS: August 2015, two searches out of the 175 relating to a parent of a child on this indictment and they're both for [Mother of Babies E & F]?

LETBY: Yes.

MR MYERS: My Lord, there are several more pages just to review in this. Although I'm trying to go through it as expeditiously as possible.

MR JUSTICE GOSS: There are. If you think it's going to take more than a few minutes.

MR MYERS: It will take more than a few minutes. We're getting the measure of it, but it will still take more than a few minutes to get to the end of the document.

MR JUSTICE GOSS: If that's a convenient time, we'll break off there then.

All right, members of the jury, 2 o'clock, please, just over the hour. Remember your obligations as jurors: no communication by any means with anyone other than all 12 of you together when you're together and no research about anything to do with this case. Thank you very much indeed.

(In the absence of the jury)

MR JUSTICE GOSS: As before, please, could members of the public leave the courtroom?

(Pause)

MR JUSTICE GOSS: We're going to do it slightly differently. I'm going to rise at this stage and then the court is closed, so just remain where you are until I've left the courtroom, please. Thank you.

(12.59 pm)

(The short adjournment)

(2.00 pm)

MR JUSTICE GOSS: Mr Myers, Mr Johnson, in future we'll have slightly longer lunch breaks for logistical reasons and timings so there can be a proper break for Ms Letby.

MR MYERS: Thank you.

MR JUSTICE GOSS: So it'll be a minimum of 1 hour and 10 minutes/1 hour and 15 minutes.

MR MYERS: We're grateful, my Lord, thank you.

(In the presence of the jury)

MR MYERS: Ms Letby, members of the jury, we were at page 3 of the schedule and we'd just looked at the total number of searches for August. If we look at September, which is on the screens. In front of you there, we can see that the total searches, looking at the end of it, for September are 209. So we've only got a few of them in this schedule, haven't we?

LETBY: Yes.

MYERS: All right. If we go just to the lower part of the entries we've got 21 September 2015. We can see 01.13, Minna Lappalainen, her name is there. And then also, searches for Ms Lappalainen at 06.58, 14.15 and 21.12.

Ms Lappalainen was a friend of yours, wasn't she?

LETBY: Yes.

MYERS: And a good friend of yours?

LETBY: Yes, a close friend.

MYERS: And we're looking at your use of Facebook in all of this. Why is it you're searching for her on those occasions, if you can remember? Why would you be searching for her on Facebook?

LETBY: She's just somebody that's on my mind. She was a big part of my life.

MYERS: And so when it's on your mind then, you go to Facebook and take a look?

LETBY: Yes.

MYERS: Just below the 21.12, Minna Lappalainen entry, there's one for 22.30 and it says "AB appeal"; can you see that?

LETBY: Yes.

MYERS: Do you remember what that relates to? I'm not asking for the identity of the person involved, but what did that relate to?

LETBY: That was a fundraising page for a child that I had met on the children's ward during my training.

MYERS: All right. Then we've got, soon after that at 22.33, a few minutes after that, a search for [Mother of Baby G], who was [Baby G]'s mother.

LETBY: Yes.

MYERS: Any particular reason why you looked for [Baby G]'s mum?

LETBY: No.

MYERS: And followed 12 minutes later with a search for a colleague, [Nurse B].

LETBY: Yes.

MYERS: And again any reason why you can remember why you searched for her?

LETBY: No.

MYERS: We can see -- I'm going to have you to ask you to speak up a little bit, please, because the microphone has to pick up what you say. No one is going to mind of your voice is loud.

That is followed over the next 11 minutes with reference to "other mother of child from COCH neonatal unit"; do you see that?

LETBY: Yes.

MYERS: Any particular reason you can think of now why you're doing those searches like that then?

LETBY: No, it's just a normal pattern of behaviour. That's what I would do.

MYERS: And this is just one section on one day, isn't it?

LETBY: Yes.

MYERS: We can see that with Minna Lappalainen, for instance, there are repeat searches there, aren't there?

LETBY: Yes.

MYERS: And with the mothers or the fathers, parents of children on the indictment, there are repeat searches for some of them, aren't there?

LETBY: Yes.

MYERS: Similarly, so we can be quite clear, with regard to parents of children who are not on this indictment, where we've got anonymised entries, can you confirm a number of those are repeat searches, aren't they --

LETBY: They are, yes.

MYERS: -- for the same people, some of them? Were any of the parents, I am not talking about the ones on the indictment, any of the parents ever friends of yours or did you have friends --

LETBY: Yes, some. Yes.

MYERS: So some of them (inaudible: coughing) were friends; is that correct?

LETBY: Yes.

MYERS: Not all but some?

LETBY: No.

MYERS: October 2015, if we just go to the total number of searches there, if we go over the page, please, to page 4. The total searches for October is 173.

LETBY: Yes.

MYERS: I'm going to move down, we can see it includes some searches for parents for babies on this indictment. If we go down to November 2015, please. I'm going to go to the central part of that table. The lower half of the schedule, please, Mr Murphy.

In fact, could we increase before then, please? A little bit higher than that. Thank you.

If we just look at that, the second entry down, 16.19 on 5 November 2015, from 16.19 through to 17.22, about 10 rows or so below, there's a series of searches, aren't there, in quite quick succession?

LETBY: Yes.

MYERS: Some for social contacts. Some for parent or parents of a child not on the indictment. And also for work colleagues who we've encountered in this case and some whose identities we haven't had in the case.

LETBY: Yes.

MYERS: Just following it right the way through, is it unusual for you to rapidly go through a number of people over minutes when you're looking at people on Facebook?

LETBY: No. That would be my normal pattern of behaviour. I just -- they come into my mind, I quickly search and then I just move on to the next thing.

MYERS: Looking at this section that's open before us there, if we look at 21.40, in fact, 21.20, we've got Ailsa Simpson on 5 November. Can you see that?

LETBY: Yes.

MYERS: She's a work colleague, we know. She's given evidence in this case. 21.40, work colleague. 21.42, work colleague. 21.43.

Then three of the parents related to children on this indictment at 23.40, 23.41 and 23.44. Certainly for the first two of those searches of a minute or several minutes. Do you see that?

LETBY: Yes.

MYERS: Again in terms of spending a minute or just a couple of minutes on somebody when you're searching, is that unusual or is it what you do?

LETBY: No, that would be normal for me.

MYERS: Can we go over the page, please. Just noting at the top the total number of searches in fact for November is 277. Five of those relate to parents of children on this indictment.

December. I'm not going to go through all of them, just going to look at the total. Page 5 into page 6, please. The total number of searches in December is 211.

Move to January, please, Mr Murphy. Look at the total number of searches for January, 199.

We have in this schedule searches in effect bookending the searches of parents relating to children on this indictment; you understand that, don't you, Ms Letby?

LETBY: Yes.

MYERS: So it's only certain dates and certain times.

LETBY: Yes.

MYERS: Generally speaking, would the pattern of your searches be constant across the month?

LETBY: Yes.

MYERS: Can we just go down to February 2016, please. We can see a total of 178 searches recorded for February 2016; do you see that?

LETBY: Yes.

MYERS: Only one in fact relating to a parent of a child on this indictment, for [Mother of Baby G] on 12 February 2016; do you see that?

LETBY: Yes.

MYERS: That comes at the end of a series of searches which, if we go up, starts with Ailsa Simpson at 23.14 on 12 February; can you see that?

LETBY: Yes.

MYERS: Then there's a series of searches over the course of several minutes --

LETBY: Yes.

MYERS: -- ending with social at 23.19?

LETBY: Yes.

MYERS: The searches, are they linked in any way to things -- in this case, anything that you have done to cause harm to [Baby G]?

LETBY: No, not at all.

MYERS: Because you understand that's the suggestion that's being made from the sequence of events and the searches and then with the prosecution. You understand that, don't you?

LETBY: Yes.

MYERS: That you're looking at these because it's babies that you have hurt in some way and it's connected with that. Is that what these searches are about?

LETBY: It's not, no.

MYERS: If we scroll forwards, please, to have a look at March and April. Look at both of those: 211 searches in March, 168 in April.

None relating to parents of children on this indictment.

Then can we go to the end of May, please, Mr Murphy, on to the next page. Thank you. And June. We can see -- at 23.00 on 29 May, can you see a search for [Mother of Baby I]?

LETBY: Yes.

MYERS: Three minutes before that there'd been a search for another mother of a child from the neonatal unit?

LETBY: Yes.

MYERS: One minute before the [Mother of Baby I] search, "other mother of child from the neonatal unit". And then a search for "father of child from the neonatal unit" a minute afterwards. Why are you searching for the people that we see here?

LETBY: They're just people that have crossed my mind at that time.

MYERS: Is there any sinister reason why you're looking at [Mother of Baby I]?

LETBY: No, it's just general curiosity, the same as the reason as I'm looking at a lot of people.

MYERS: Was it your habit to go and look at the parents of babies on this indictment if you'd gone and hurt them or done something to them?

LETBY: No.

MYERS: June 2016, 233 searches. But none relating to the parents of children on this indictment.

LETBY: No.

MYERS: So would you describe yourself, as far as you can tell, as a pretty regular user of Facebook searches over the period we're looking at?

LETBY: Yes, very much so, yes.

MYERS: Did you live on your own for most of the time?

LETBY: Yes.

MYERS: We see some of the searches are in the late evening, aren't they?

LETBY: Yes.

MYERS: Is it unusual for you to go on to Facebook and look at people or make searches when you're on your own and you've got time on your hands?

LETBY: No, I was always on my phone.

MYERS: All right. Thank you for helping us with that. I'm going to move to a different area now to do with your house and items that were found from it.

I'd like you to help us next with where you were living and when over the period that you were working at the Countess of Chester. So I'm actually going to go back to 2012. When you had first qualified and started working there, where were you living?

LETBY: So I lived on site in the hospital grounds in staff accommodation.

MYERS: Actually on the grounds of the Countess of Chester?

LETBY: Yes.

MYERS: I'm going to ask you to keep your voice up if you would, please. Is there a name for that accommodation, the premises? What was it called, the place you lived at?

LETBY: Ash House.

MYERS: And that's a hospital accommodation, is it?

LETBY: It is, yes, for staff.

MYERS: Did there come a time when you moved out of there and began to live somewhere else?

LETBY: Yes.

MYERS: Again, casting your mind back, so take your time to think through the timings, but when did you move out of Ash House?

LETBY: Around June 2015, around that time.

MYERS: Was there a time you moved out before then and stayed with somebody in between two dates?

LETBY: Yes.

MYERS: All right. You first went to Ash House in 2012?

LETBY: Yes.

MYERS: Did you move out to live with somebody at a date after that?

LETBY: Not to live with somebody, but I did move premises, yes.

MYERS: Where did you move to?

LETBY: I moved to a flat in town.

MYERS: Did anyone else live there?

LETBY: No.

MYERS: When was that?

LETBY: I think that was 2015.

MYERS: Right. Did you ever live with any of your colleagues from the unit?

LETBY: No.

MYERS: Did you ever move back into Ash House?

LETBY: Yes.

MYERS: When did you move back into Ash House?

LETBY: Towards the end of 2015.

MYERS: All right. I'm going to see if I can help you with something. I'm going to ask if we could put up a page of your 2015 diary. It's t exhibit page J355, please, Mr Murphy. This is the 2015 diary. We have heard there were two diaries when the police came to your house that were seized: one for 2015, one for 2016.

This is the 2015 diary. Can you see it says:

"Monday, 1 June [asterisk] Ash House"?

LETBY: Yes.

MYERS: Does that help you with dates when you moved back to Ash House after you'd moved out?

LETBY: Yes.

MYERS: When did you move back?

LETBY: So that would be on that date, 1 June.

MYERS: Right. So you'd started off living at Ash House, then you moved out at some point to a flat elsewhere, and then you moved back in on 1 June 2015; is that right?

LETBY: I think so, yeah.

MYERS: All right.

MR JUSTICE GOSS: It's not a memory test, obviously. She did say she moved out from Ash House, she thought, around June 2015. In fact the diary shows she's apparently moving from wherever she's been back into Ash House at the beginning of June 2015.

MR MYERS: Do you remember how long you'd be living away from Ash House before you went back? How long did you stay at this other place about?

LETBY: About 6 months.

MYERS: So maybe you moved out of Ash House -- then that would be some time in the middle of 2014 --

LETBY: I could be -- I'm not 100% --

MYERS: -- or late 2014?

LETBY: -- sure with dates.

MYERS: Then you moved back in on 2015, June.

If you just look across from there, can you say it says "Jen's hen party, York" for 5 June?

LETBY: That was Jennifer Jones-Key, who was a nursery nurse on the unit. That was her hen weekend which I went to.

MYERS: Right. So that was about the end of the week after you'd moved back to Ash House?

LETBY: That's right.

MYERS: We know that when the police arrested you the first time you were living at an address at 41 Westbourne Road in Chester?

LETBY: That's right.

MYERS: Do you remember when it was that you moved to that address approximately?

LETBY: It was around April 2016.

MYERS: Is that a house that you bought?

LETBY: It was, yes.

MYERS: I'm going to ask if we could just to put up an image from the prosecution images at page 16, please. This is again with the diary just to help with dates, Ms Letby. It's page 16. Again, images we have had from the prosecution.

Can you see, this is the diary now for 2016. We can't see the date on it but it is the 2016 diary and we can see on Tuesday 5 April it says, "Out of Ash H".

LETBY: Yes.

MYERS: So we know you'd gone back into Ash House on 1 June 2015. And on 6 April 2016, it says, "Out of Ash H".

LETBY: That's right.

MYERS: So where were you moving to then?

LETBY: That was when I moved into the property in Westbourne Road.

MYERS: And that's the --

LETBY: The house that I bought.

MYERS: And that's where you were living at the time of the arrest, is it, the first arrest --

LETBY: It is, yes.

MYERS: -- which took place in July 2018.

Just with regard to what was happening round about this time, I am going to go to some messages that we actually had on the [Baby L] sequence of events just to do with you moving house so we can put them in context. I'm going to ask if we could go to tile 48, Mr Murphy, to several tiles, Ms Letby.

This is from you to [Nurse E] on Friday, 8 April. Just a couple of days, 2 or 3 days after the entry in the diary and you're saying:

"Unpacking. Stuff everywhere lol. May do extra shift over weekend."

It may be obvious to us now, but what's that relating to?

LETBY: That's relating to me having moved into the house and I'm unpacking.

MYERS: Could we go forwards to tile 57, please. It's Sophie Ellis to you on Friday 8 April saying:

"How's the house, pal?"

And 58, please, Mr Murphy. You reply:

"Hi. It feels a bit weird having a whole house but it's good thanks, although stuff everywhere as moved in properly on Tuesday and been at work Wednesday, Thursday and today. Doing tomorrow as an extra so I'll see you tomorrow night. Won't be such an early start for you now back in Chester."

And then you said:

"Did I hear your grandparents are coming to see you?"

If we keep in mind 9 April is a date associated with [Baby M].

LETBY: Yes.

MYERS: In fact what was going in your life at that time?

LETBY: So I was in the process of moving house whilst working a number of shifts.

MYERS: How big a thing was that on your mind?

LETBY: Um... Well, as anybody knows, when you move house it's a lot to take on, isn't it? So I was very occupied with sorting the house out.

MYERS: Yes. I'd like to look at some images of the house. Are you all right with that? I would like to put up D26, please. These are images taken by the police at the time of the first arrest or around that point.

Again, just to help us with picturing this, what are we looking at on page 1 of D26?

LETBY: That's the front of my property with my car on the drive.

MYERS: That's 41 Westbourne Road, is it?

LETBY: Yes.

MYERS: Thank you. Are you all right looking at these?

LETBY: It's just quite difficult.

MYERS: All right then. Can we just go to photo 2? So we know, what area is that?

LETBY: That's the back garden.

MYERS: And photo 3, please. Likewise?

LETBY: Yes.

MYERS: Just towards the left of the photo where we can see the French windows, is that the back of your house?

LETBY: It is, yes.

MYERS: Photo 4, please. And photo 5. All right. The eagle-eyed may notice that that green bin moved around in the course of those photos. Do you know how that happened, the moving of the green bin?

LETBY: No, that wasn't done by me.

MYERS: No. Were you there when the police were taking these photos?

LETBY: No.

MYERS: And photo 6, please. We'll see it's moved back somewhere else in fact. All right.

Photo 7, please, Mr Murphy. Again we've seen a similar photo before. Where is this?

LETBY: That's the garage.

MYERS: Could we see photo 8 as well, please. That's just the same garage from a different angle?

LETBY: Yes.

MYERS: All that stuff in there, is it all yours?

LETBY: Some of it. The tools at the back wall that we're seeing there belong to my dad. He would help me out with general maintenance around the property.

MYERS: Did he help you when you moved in with things?

LETBY: He did, yes.

MYERS: So his tools are there?

LETBY: Yes.

MYERS: Do you recall what's in the bags that are hanging up or do you not recall?

LETBY: I don't recall.

MYERS: Did you store stuff in the garage?

LETBY: I did, yes.

MYERS: Let's go inside then. Photo 9, please, Mr Murphy.

What are we looking at here?

LETBY: That's the downstairs, the living room and dining area.

MYERS: The French windows at the end, are they the ones we could see looking in from the garden?

LETBY: Yes.

MYERS: Photo 10, please. We've moved forwards in the living room here; is that right?

LETBY: Yes.

MYERS: And we can see on the left-hand side there's a door, you can just see it looks narrow here, a doorway on the left-hand side of that picture.

LETBY: Yes, that's the doorway to the kitchen.

MYERS: All right. What about the stairs on the right of the -- in the middle of the picture. Where do they go?

LETBY: They lead to the upstairs of the property.

MYERS: Can we go to photo 11, please. Is that looking into the kitchen?

LETBY: Yes.

MYERS: And the back. Photo 12, please. Is this where you were living up to the time of your arrest?

LETBY: Yes.

MYERS: Can we look at photo 13, please. Obviously we're being careful with privacy and identities. Can you help us with what it is we have on photo 13?

LETBY: This is a noticeboard that I had up in my kitchen, which contains various photographs and letters and just things that are important to me.

MYERS: And this is -- this would have been in situ like this, in position, at the time that the police came and arrested you on 8 July 2018?

LETBY: Yes, that's right.

MYERS: I'm in the going to ask you for the names of the people whose faces have been blanked out, not the name, but who's the person in the top left-hand corner?

LETBY: That's my cousin and godson.

MYERS: Your cousin and godson. And then we're just going to go round clockwise. It says:

"Number 1 godmother. Awarded to Lucy Letby."

That's from the godson?

LETBY: That was something he had drawn for me.

MYERS: Going across the top on the right-hand side there's something that says, "Auntie Lucy, thank you". Do you recall what that is?

LETBY: Yes. So those are another two of my godchildren and it was a thank-you note for some gifts that they'd had at Christmas.

MYERS: Right. Moving down, various items pinned to the board. There's someone with what looks like possibly a school uniform blanked out on the right-hand side. Again, we don't require the name, but who is that person?

LETBY: That's another cousin of mine.

MYERS: Another one of your cousins. Can we scroll down the picture, Mr Murphy.

I'm not going to ask you about the cuddly toy that's hanging there. Down at the bottom on the left-hand side, this one says "Hay Festival exclusive". Who are the people in that picture?

LETBY: That's my mum and dad.

MYERS: Was it actually something from the Telegraph or is it a kind of novelty card that's been --

LETBY: No, it's just a novelty card from the Hay Festival, which is just a festival they'd gone to.

MYERS: Scroll back up to where we were. Just above the dolphin figure, who or what is that a photograph of?

LETBY: That's a picture of myself and two nurses on the unit.

MYERS: Right. That's you back in 2016?

LETBY: Yes.

MYERS: Is that the coloured scrubs that you wear when you're a band 5?

LETBY: It is, yes.

MYERS: Thank you.

Can we go next, please, to photograph 14? So if we walked past this in your house where you were living at the time, where is this?

LETBY: As you go up the stairs, it's the landing area.

MYERS: So landing on the stairway?

LETBY: Yes.

MYERS: And the left -- who's in the photograph on the left? Again I'm not asking for names.

LETBY: They're the two cousins that I've talked about, so --

MYERS: Is that you with them?

LETBY: It is, yes.

MYERS: And over on the right-hand side again blanked out?

LETBY: They're the two godchildren that I mentioned in the previous images.

MYERS: Let's go upstairs then, please, to photograph 15. Thank you. Which room is that one?

LETBY: That's my bedroom.

MYERS: Actually, we can compare this, we can nip out of these if possible and look at the prosecution images number 2. We can see what's where. If it's possible to look at prosecution image number 2, which is the photo of this room, but shortly after the point of arrest.

So this is where you'd been sleeping -- I'll deal with this as quickly as I can, Ms Letby. This is where you'd been sleeping at the time of the arrest, isn't it, and this is your room after you'd been arrested; is that right?

LETBY: Yes. That was how they left it.

MYERS: That's how it was left, all right. We can see at the end of the bed, on the bedpost, a kind of pink -- a bright pink cardigan and maybe a paler pink one on the centre of it? Do you see that?

LETBY: Yes.

MYERS: We can see the radio on the left-hand side on the cupboards and the books on the right-hand side.

Then if we go back then, please, to the photographs we were looking at at page 15, please, Mr Murphy, just with those orientation points, we can see again the pink -- the two pink tops, can't we?

LETBY: Yes.

MYERS: And we can see the books over on the other side of the bed. But obviously somebody straightened the bed up for you after your arrest; would that be right?

LETBY: Yes.

MYERS: That'd be your dad probably.

LETBY: Yes.

MYERS: Maybe that's the room afterwards. Can we go finally on these to page 16. First of all, which room is this cabinet in?

LETBY: That's in the downstairs living area.

MYERS: So back to the downstairs. I would like you to explain to us what the files are for that we can see. So if we look at the thickest one with the kind of light blue cover to it on the

right-hand side, do you want to use the cursor just so we can be in no doubt what we're talking about, please. If it's working.

MR JUSTICE GOSS: It's the one bang in the middle of the lower shelf.

MR MYERS: Thank you, my Lord.

What did you keep in that?

LETBY: So that was general paper documents, like passport, bills, things related to the house, driving licence.

MYERS: What about the thin blue wallet above that, that was that?

LETBY: That's a folder that had the medical records of my two cats that I had at the time.

MYERS: What were the names of the cats? We're going to come to it, aren't we? They appear on some of the notes, don't they?

LETBY: Tigger and Smudge.

MYERS: All right. And then just going across form there, the bright pink wallet, what did you keep in that?

LETBY: I think that was just more general documents. I think it might have had some study day details in and things.

MYERS: Is it unusual to have study day details from courses you've been on or training you've had?

LETBY: No, I've kept everything through the whole of my training. I've never thrown anything away.

MYERS: Keeping things -- is keeping things unusual for you?

LETBY: No.

MYERS: We're going to have a look at some of the items in the prosecution images we've looked at. I wonder, just to start with, could we look at prosecution -- we've finished with those photographs, Mr Murphy. Could we look at prosecution images page 15. We understand that the diary, the 2016 diary that we've looked at, part of, has come out of that middle -- the top drawer of that middle chest of drawers?

LETBY: That's right, yes.

MYERS: Is that where you kept that?

LETBY: Yes.

MYERS: If we next look at page 18 of the prosecution images, please, Mr Murphy. So prosecution images page 18. Thank you. There's no issue as to this. This has been moved now for the purpose of being photographed by the police, hasn't it?

LETBY: Yes, it's now downstairs on the dining table.

MYERS: So that's been moved for a photograph. The pieces of paper or the sheets of paper tucked behind the 2016 diary cover, are those bits of paper that you kept in that diary?

LETBY: Yes.

MYERS: The green note we've looked at, was that in the diary as well?

LETBY: Yes.

MYERS: What about the item that says Smudge behind it, what's that about?

LETBY: That is my vaccination record for one of cats. That would have been in the blue folder that I mentioned in the unit in the kitchen -- in the dining room, sorry.

MYERS: All right.

LETBY: Yeah, that was placed there.

MYERS: Let's go through some of the items as we saw them when the prosecution were showing us these. I would like to go first to page 6 of those images, Mr Murphy.

I'm going to ask you about the two handbags on the right-hand side of that mirror when we're looking at it, Ms Letby. One is black. What colour would you say the other one is?

LETBY: It's pink.

MYERS: Pink, all right. We know which ones we're talking about. What were the handbags for?

LETBY: So the pink bag is what I used daily for going to work and then the smaller bag was for more casual use, just socially.

MYERS: Pink bag for work, smaller bag casual use socially. There are a couple or several notes that were taken from these which we're going to come to. That's the significance or potential

significance of these. But is this where you kept them in your bedroom as a rule?

LETBY: Yes.

MYERS: We know that you had been -- sorry, had you been anywhere in particular shortly before you were arrested?

LETBY: Yes, I'd just been on a family holiday with my parents and we'd just come back the day before.

MYERS: The notes that come from these bags, we've actually got set out at page 7 of the prosecution images. I wonder if we could just put that up next. I think it was unclear precisely which bag the note or notes had come from. Do you recall which bag in particular any or all of these notes came from, Ms Letby?

LETBY: No, I couldn't say.

MYERS: But you accept they come from one or other of those bags?

LETBY: Yes.

MYERS: Both pieces of paper have writing on either side. We're not going to look at all of this but we are going to look at some of it if you're all right with that. The notes -- we asked you about notes earlier. Why did you write notes down in the kind of style that we see here?

LETBY: That's something I've done my whole life. I just -- I write things down.

MYERS: Did you write down things that you could say to other people?

LETBY: No. It was my way of processing my thoughts and emotions that I wouldn't say to anybody else.

MYERS: Was it written in any kind of structured way?

LETBY: No, it's very much what would come into my head. It could be very -- just random and sporadically written.

MYERS: We are going to have a look at some of what's on the yellow piece of paper and some of what's on the larger piece of paper, not everything, but it's there for you to be questioned about if there's anything I don't cover.

With the yellow piece of paper I'm going to ask if we can go to page 9 of the prosecution images first because that's an enlarged bit of the yellow piece of paper.

Out of interest, when you look at this can you look at it and automatically see all the things that are written on it and read it easily?

LETBY: No.

MYERS: So is it difficult for you to make --

LETBY: It is, yes.

MYERS: -- to read through? Well, we can look at some of the detail on this one. What does it say right at the top, can you help us? The very first joined up letters.

LETBY: "Love was all we needed."

MYERS: "Love was all we needed." Where have you got that expression from, if you don't mind me asking?

LETBY: It's the lyrics in a song that was obviously just on my mind at that time.

MYERS: By?

LETBY: Craig David.

MYERS: Right, "Love is all we needed". Were you saying that to anyone in particular --

LETBY: No.

MYERS: -- in the note?

LETBY: No, these weren't for anybody to read, they were just an outlet for me.

MYERS: It says under that "[Baby P], [Baby O], [Baby R]". That's the name of the [Surname of Babies O, P & R] triplets, isn't it?

LETBY: Yes.

MYERS: Is there any reason why their names appear there?

LETBY: I'm thinking of them at this time.

MYERS: I asked you earlier about the impact of deaths of babies on the unit. Is that something that would have an impact on you?

LETBY: Yes.

MYERS: Across from there it says "[Dr A]". What does it say under that?

LETBY: "My best friend."

MYERS: Is that a reference to [Dr A] at the time that was written?

LETBY: I believe so, yes.

MYERS: Does that relate to how you felt about him?

LETBY: Yes, he was -- he was a trusted friend at that time, yes.

MYERS: To the left of that, I'm going to hazard a guess. Is that "Love is all we needed" again?

LETBY: Yes.

MYERS: We're going to see expressions like that -- it keeps appearing in the note, doesn't it?

LETBY: Yes.

MYERS: Why does it keep appearing in the note? If it's possible to say, and if you can't, say so, but is it possible to say why?

LETBY: I think that's just how I often write. It's very, very repetitive, very random, just things that are in my mind will just come out on paper. There's no sort of structure, it's just... A release of some sort.

MYERS: When it says under that, under "Love is all we needed" --

MR JUSTICE GOSS: I think it's "was".

MR MYERS: "Love was all we needed."

LETBY: Oh yeah, sorry.

MR JUSTICE GOSS: Well, that's what you said it was originally, and then you changed --

MR MYERS: I think I'm confusing it with another song lyric, my Lord, but, yes, "Love was all we needed".

MR JUSTICE GOSS: By the Beatles.

MR MYERS: "I can't do this any more" under that. Is that what it says? I don't want to get the words wrong.

LETBY: Yes.

MYERS: What are you meaning or what can't you do?

LETBY: My life at that time.

MYERS: Right. What does it say under "I can't do this anymore"?

LETBY: I think it's further lyrics, "But time let us down".

MYERS: "Time let us down"?

LETBY: Yes.

MYERS: Does that follow on in the lyrics from "Love was all we needed"?

LETBY: Yes.

MYERS: "Love was all we needed but time let us down."

Who's Catherine de Berger?

LETBY: So that was a lady I was receiving support from, from occupational health when I was redeployed.

MYERS: The name Tigger, who is that referring to?

LETBY: That's one of my cats.

MYERS: The other was Smudge, wasn't it? Can you see it looks like there's the word "today"?

LETBY: Yes.

MYERS: Does that say "Today is your birthday"?

LETBY: Yes.

MYERS: Who are you writing that about, can you help us? Who are you thinking of?

LETBY: So [Baby P] and [Baby O].

MYERS: "Today is your birthday but you [is that] aren't here"?

LETBY: Yes.

MYERS: It says, "And I am so sorry..."?

LETBY: "So sorry for that."

MYERS: Why are you saying that you're sorry for that? What is it that's making you sorry?

(Pause)

LETBY: I think this was on their anniversary and I was thinking of them and...

MYERS: And then under that, it's difficult to -- what's the bolder writing, is it TT or something? What does that say?

LETBY: Where, sorry?

MYERS: Under "aren't here" and "I am so sorry for that", if you carry on going from left to right, there's slightly darker ink. It might be tiny or Timmy or something.

LETBY: It might be Timmy in relation to a dog that I used to --

MYERS: All right.

LETBY: I think, yeah, that's Timmy.

MYERS: But under Timmy, it carries on with "I'm sorry that", can you see that?

LETBY: Yes.

MYERS: And can you help us with what it says after that? "I am sorry that", what?

LETBY: "Sorry that you couldn't have a chance of life. You should have."

MYERS: Carry on, Ms Letby, you should have?

LETBY: Um... "And for the pain that your..."

MYERS: Is that parents?

LETBY: I can't see parents on there.

MYERS: Can we scroll down? I apologise.

LETBY: "... parents must experience every day."

MYERS: All right. This is something you're writing to yourself, isn't it?

LETBY: Yes.

MYERS: Yes. And what do you say -- under the scribbled words, the letters, probably following on from the sense of what we've just been reading. After "every day", what do you follow that with? "We [something]."

LETBY: "We tried our best and it wasn't enough."

MYERS: Right. So when you said "We tried our best there", what are you talking about?

LETBY: Us as a team.

MYERS: And who are you writing this to?

LETBY: To no one, to myself.

MYERS: Right. "It wasn't enough." How were you feeling about the fact that if, as this says, you tried your best and it wasn't enough?

LETBY: I was distraught, really.

MYERS: Do you recall whether this was written at a time after you'd found that you were being blamed for deaths?

LETBY: Yes, it was, yes.

MYERS: How did you feel, being blamed for deaths, when what you're writing here is that you tried your best?

LETBY: Just devastated.

MYERS: Under there, where it says "We tried our best and it wasn't enough", there's the words, it looks like, "I can't do it any more"; is that right?

LETBY: Yes.

MYERS: What does that mean, "I can't do it any more"?

LETBY: Life.

MYERS: What do you continue writing under that, following on from what you'd written above that?

LETBY: "I don't know if many people will think of you today or any day, but I do. I will always remember because you should be."

MYERS: Right. Pause there. Is this what was on your mind?

LETBY: Very much so, yeah.

MYERS: Could you read through to the end of that, please?

LETBY: "I can't do this any more. I want someone to help me but they can't, so what is the point in asking? Hate my life."

MYERS: Right. Is it you that's written "help" in the middle of that?

LETBY: Yes.

MYERS: Why have you written "help"?

LETBY: Because I just wanted someone to help me and at that point nobody could help me.

MYERS: Can we go over to page 10, which is the other side of this note. The prosecution images, page 10.

If we carry on reading this, Ms Letby. It says:

"Please help me, please help me, help me."

Why were you saying that? Sorry to ask again.

LETBY: Because that's what I wanted: I just wanted somebody to help me.

MYERS: You'd been involved with a grievance procedure; is that correct?

LETBY: Yes.

MYERS: You'd been taken off the unit; yes? You hadn't asked to be taken off, had you?

LETBY: No.

MYERS: We've been over this. And you'd found that people were saying things that held you responsible for deaths on the unit?

LETBY: Yes.

MYERS: How hard had you tried to look after the children on that unit who you cared for?

LETBY: I only ever did my best.

MYERS: What did it feel like to be accused or to have the finger pointed at you for the things that it was being pointed at you for?

LETBY: I don't think you can really put it into words. It -- it was just devastating and it changed my whole life.

MYERS: I'm not going to go through all of this, it is here, but I would like to ask you something, if we scroll down the page. In capitals down at the bottom we can see the word "bastards". Can you see that?

LETBY: Yeah.

MYERS: We've seen lots of messages from you, Ms Letby, and we've seen lots in the notes. Some people swear with complete abandon and other people don't. Quite a personal thing, swearing. We've not seen you swearing in text messages, have we?

LETBY: No, that's not language I would use, no.

MYERS: Why are you using that language in this note that you're writing for yourself?

LETBY: Because that's how I felt about some people. And I suppose I could use that word because it was private for me.

MYERS: Was it directed at any people in particular? Who, do you think, looking back?

LETBY: Ravi Jayaram and Steve Brearey.

MYERS: Why did you say that about them?

LETBY: Because of the things they'd been saying about me.

MYERS: Right. Let's move, please, if we could to page 13, which is the white piece of paper from the bags with lots of items written on it. It's prosecution image, page 13.

I'm not going to read every line of this with you, but this contains a lot of names over it, doesn't it?

LETBY: Yes, it does, yes.

MYERS: At the top underneath -- thank you. Just underneath the triangle where it's torn, what's the first name that appears up there?

LETBY: That's my name and signature.

MYERS: Then underneath that, what does it say?

LETBY: "Please help me."

MYERS: What or who is Whiskey?

LETBY: Whiskey was a dog, my dog that I had when I was a child.

MYERS: Was Whiskey still alive at the time you were writing this?

LETBY: (Inaudible: coughing).

MYERS: So why were you thinking of Whiskey?

LETBY: Because he was an important part of my life.

MYERS: And then underneath that, is that:

"Love was all we needed but time let us down"?

LETBY: Yes.

MYERS: "Please help me."

Just looking at that we can see names like [Dr A], Karen Rees, Berger, and various other names you might be able to pick out. Why are you writing names over and over again on this piece of paper?

LETBY: Because they're important people to me and they were just on my mind at that time. I would just write about people that were important to me. At that time I had a very limited support network, so these people were very important to me.

MYERS: Can we scroll down to see the remaining part of that note, please. Thanks, Mr Murphy.

We've got the names Tigger and Smudge, that's your cats, isn't it, and your name written out repeatedly; is that right? [Dr A].

LETBY: Yes.

MYERS: We can see in fact, just towards the left-hand side near the bottom it says "Rees", and we have seen Karen Rees a little bit higher up.

LETBY: Yes.

MYERS: We have heard her name before and it's also on this page higher. Who was Karen Rees?

LETBY: Karen Rees was the director of nursing at the Countess of Chester, and she was my main support during this time when I was redeployed.

MYERS: Let's go over the page, please, to the back of this piece of paper, which is page 14 in the prosecution images.

Just looking at that, why are you writing different inks on this?

LETBY: Because it may well have been done at different times.

MYERS: Have you drawn the pink love heart that we can see on the right-hand side?

LETBY: Yes.

MYERS: And have you drawn and made all the other marks on there?

LETBY: Yes.

MYERS: We've seen a lot about how you were feeling and you've used the word "hate". We can see, to the top left, it has the word "love" in a rectangle. Why have you written that, if you can remember?

LETBY: I'm assuming it's the love for the people that were important to me.

MYERS: Right. We can take that down, there's nothing else I want to ask you about that at the moment, but it's there and we can look at it if we need to, or others can.

I'm going to ask you about the diary next, please, Ms Letby. Is it unusual for you to keep a diary?

LETBY: No, I've always kept a diary.

MYERS: The diaries that cover this period are diaries for 2015 and 2016. In general at this time of your life what did you use your diary for?

LETBY: For everything, really. I would document my work shifts, any social activities, birthdays, appointments. Everything, really, went into my diary.

MYERS: The bits of paper that we've seen that were tucked into the diary. That's not the one we looked at there, they came from the handbags, but we'll see paper from the diary and that note

came from the diary. How did they end up in the diary or why did they end up in the diary?

LETBY: So I put them in the diary. So at some point I've been writing them and they have gone into the diary.

MYERS: In the 2016 diary that we looked at in particular, reference was made to some of the babies in this case.

LETBY: Yes.

MYERS: So why would you make reference to one of the babies in this case, or any baby, in your diary?

LETBY: I would sometimes write down significant events that had happened or something that had stood out in terms of something unusual or a training opportunity on the unit.

MYERS: Right. Let's have a look at page 16, if we could, in the prosecution images. This is the one that's included in the presentation that we have here and it deals with the period 4 April through to 10 April 2016.

That's a period that covers the time of the event or events we're looking at with [Babies L & M]. Do you follow that, Ms Letby?

LETBY: Yes.

MYERS: What I'm going to do is actually, with your assistance, take a period about five pages before and five pages after this, since we have that diary, just to look at what was in that. Are you okay if we start with that and we'll just go through a number of weeks to see the type of thing that's in the diary?

LETBY: Yes.

MYERS: Bookending this, I'm going to ask Mr Murphy if we could go to page 412 from the exhibits. We'll need to flip that round.

So this starts on 29 February. That's the date there. 2016. Just going through this, where it says Tuesday and then, is that St David's Day, is there something faintly that you've written in next to that, ID or something?

LETBY: I think that's a long day.

MYERS: LD?

LETBY: Yes.

MYERS: Long day. Why would you have written that in?

LETBY: So sometimes I would write in requests that I had made for shifts to work, so it may have been that that's originally what I thought I was going to be working and it's changed.

MYERS: Then for Wednesday the 2nd it's got salsa. That might be obvious, I won't keep asking you why whenever we see salsa, but just for this first time why have you written salsa in there?

LETBY: I would write down when salsa classes or there are parties that we go to, so I'd just write down when it was happening.

MYERS: That's something you enjoyed doing?

LETBY: Yes.

MYERS: Was it something you did regularly?

LETBY: Yes.

MYERS: Did you have friends there?

LETBY: Yes.

MYERS: The N under salsa, what does that stand for?

LETBY: Night shift.

MYERS: Then the following day, Thursday the 3rd, we've got N; can you see that?

LETBY: Yes.

MYERS: I'm not going to read out all the names that we see when we see them, but there's a name beginning with a K there.

LETBY: Yes.

MYERS: Can you see that? Thank you, Mr Murphy.

LETBY: Yes.

MYERS: Who does that relate to? What kind of person is that?

LETBY: That's a patient on the unit.

MYERS: Why is that in the diary?

LETBY: Because something unusual, significant, has happened or I've done something related to training that I've documented.

MYERS: And why would you put it in? Because attention has been pointed to where you put names in, some names, so why would you put the name in if it was something unusual or some training --

LETBY: Just for my own reflection and development, really, tracking things that I'd done in my career.

MYERS: And then on the Friday we see the same name next to N.

LETBY: Yes.

MYERS: Is that the same reason?

LETBY: Yes.

MYERS: Then could we go across to the Saturday, please, on the other side. It's got N. What does that stand for? Is that nights?

LETBY: That's night shift.

MYERS: And another night shift?

LETBY: Yes.

MYERS: There's four on the Sunday, so that's four night shifts in a row, is it?

LETBY: Yes.

MYERS: And the names there, not names of anybody on or connected to this indictment?

LETBY: No.

MYERS: Why would you have written those down?

LETBY: For the same reasons as I've said: something's happened that was significant or something I wanted to document that I'd learnt from on that day.

MYERS: When you say something's happened, so there's no misunderstanding, are you suggesting there's something sinister when you say something's happened?

LETBY: No, I mean something that stands out, so something that maybe I could use as reflection going forwards, a skill that I might have used for the first time, or... More things like that,

for me to reflect on babies that I've cared for with different needs.

MYERS: Under "notes" it's got some asterisks and it says in pink ink "Skin patch test". If you can remember, what would that relate to, skin patch test?

LETBY: I'm not -- probably, I think it might be a hairdresser's thing.

MYERS: Go over the page, please, 413. Tuesday, 8 March. It says "Stretton Fox at 12.00".

LETBY: Yes.

MYERS: What does that refer to?

LETBY: The Stretton Fox is a pub that a few of the girls used to meet up for lunch. That's just a reference to that. I met some people for lunch there.

MYERS: When you're not working?

LETBY: Yes.

MYERS: What does it say under that, "something email"? It may not say email.

LETBY: "Forms arrived."

MYERS: Do you know what the forms are relating to? What was going on in your life at this point?

LETBY: Maybe in relation to the house purchase.

MYERS: Because we know you move into the new house round about the 5th or 6 April, don't you?

LETBY: Yes.

MYERS: And this is now about a month before March?

LETBY: Yes.

MYERS: So salsa and hair and beauty works, is that an appointment on the Wednesday?

LETBY: Yes.

MYERS: And then we've got Ellie G, who would that be?

LETBY: I went to see Ellie Goulding in concert and stayed at the 30 James St Hotel.

MYERS: Is there any fixed pattern to what colour ink you happen to use for which entry when you're keeping your diary?

LETBY: I tended to use blue for work-related things, but otherwise no.

MYERS: Thank you. So "AL" across the top of this week in blue, what would that stand for?

LETBY: That's in reference to that I'm on leave from work, so I'm on holiday, annual leave.

MYERS: Right. If we just look at the Sunday, the 13th, it says:

"Mum and dad, house, 11.00."

What does that relate to?

LETBY: I would think that's mum and dad coming to view my house with me.

MYERS: Are you all right if we just carry on for a few more of these perhaps until we get to the end of this sequence?

LETBY: Yes.

MYERS: If we pop over the page then, page 414. We can see under Monday, 4 March, it's written in, "Paid full amount". Paid full amount for what, we might be able to guess, but could you tell us?

LETBY: I think that's for the house.

MYERS: And then exchange the following day?

LETBY: Yes.

MYERS: How big a thing in your life was it, the buying of this house?

LETBY: Oh, it was huge, a huge milestone.

MYERS: And were you working nights on the Tuesday, Wednesday, Thursday?

LETBY: Yes.

MYERS: "Keys 17.30", down at the bottom. Is that for the new house?

LETBY: The time I collected the keys, yes.

MYERS: Just look across the page, please. Salsa Buckley and then a word I'm not too sure about.

LETBY: Bachata. It's a form of salsa.

MYERS: Is that something that was happening on the Saturday night, the salsa?

LETBY: That's a reference to salsa that has taken place in Buckley and I have ticked it, which means that I've gone, I think.

MYERS: Seeing your mum and dad the next day?

LETBY: Yes.

MYERS: I'm going to move to the next page, please. On the Monday what are the notes referring to, "Greencroft and washing machine".

LETBY: I'm not sure about Greencroft, but washing machine is obviously having a washing machine delivered to the house.

MYERS: Right. Down at the bottom of the page, what does "Gloucester Keys" refer to on 25 April -- march.

LETBY: Gloucester Quays is a place that's somewhere I've gone to.

MYERS: Somewhere you went?

LETBY: Yes.

MYERS: Across the page "Zizzi 18.30"?

LETBY: Again, I'm in Hereford at this point meeting with friends from school.

MYERS: Let's move to the next page, please. Thank you. It says under Tuesday the 29th, is that -- does it say "bed"?

LETBY: Yes. So I've had my bed delivered on that day.

MYERS: All right. And "[Nurse E] PM", who's that a reference to?

LETBY: [Nurse E].

MYERS: The entries in blue for Thursday at LD, is that long day?

LETBY: Yes.

MYERS: And the Friday, the 1st, the N?

LETBY: Yes, so that's nights.

MYERS: Looking across the page, nights also on Saturday and Sunday?

LETBY: Yes.

MYERS: So is that in effect four duties in a row?

LETBY: Yes.

MYERS: If we go, please, to the next page, which is the page we started at with the prosecution image. We're familiar with this now. Tuesday, 5 April. You can confirm for us, is that you moving out of the hospital accommodation?

LETBY: It is, yes.

MYERS: And you moved into 41 Westbourne Road around this time?

LETBY: That's right.

MYERS: A long day on the 6th with salsa and then it says LD and then there's a name on Thursday the 7th; can you see that?

LETBY: Yes.

MYERS: Is that a baby you cared for?

LETBY: Yes.

MYERS: Why is that name in here?

LETBY: Again, something has stood out with that baby.

MYERS: That's just something you did, is it, that?

LETBY: Yes, it's just for my own reflection.

MYERS: And the 8th, we can see "LD twins". Then also across the page, if we look at both of these:

"LD. Extra. Twins resus."

Those both coincide with [Babies L & M], don't they?

LETBY: Yes.

MYERS: Is that who that refers to?

LETBY: Yes, it is, yes.

MYERS: Can we go to the next page, please. Just a handful more pages, Ms Letby, and then we're done going through this and we'll have a break. Is that all right?

The 12th, Amie, [Nurse E], Laura. Can you help us with that?

LETBY: They're friends that came round to the house at that time.

MYERS: Is that Amie from work?

LETBY: No.

MYERS: Is it [Nurse E] from work?

LETBY: [Nurse E] is from work, the other two aren't.

MYERS: If we look down at the Wednesday where it says "Minna 14.00", that refers to Minna Lappalainen?

LETBY: Yes.

MYERS: Then the other duties are marked in on this page, aren't they, on both sides of the page, LD, N?

LETBY: Yes, I crossed through the nights because my shifts have changed at that point so I was initially doing nights on the 13th and 14th, but obviously got changed to long days.

MYERS: All right. We're going to move through the next ones a bit more rapidly. Page 419, please, which is the next page in the diary. Again appointments and your social life in pink or red, aren't they?

LETBY: Yes.

MYERS: And does blue tend to refer, we can see, to work commitments?

LETBY: Yes, blue tended to be work-related, yes.

MYERS: Go to page 420, please. Again social engagements in pink; is that right?

LETBY: Yes.

MYERS: Including on the 26th, Tuesday, lunch with Jen at Tatton Park; is that right?

LETBY: Yes.

MYERS: Salsa in Mold on the Saturday?

LETBY: Yes.

MYERS: Just under the notes where it says various items and "council", is that items you have to pay?

LETBY: Yes, that's reminders for me to pay my car tax and council tax and Tesco credit card bill.

MYERS: If we go to 421, please. There's one more after that. And 422.

Just looking at this one, which is just at the start of May, can you see under Wednesday, is that LD?

LETBY: Yes.

MYERS: And then is that a name written under that?

LETBY: Two names.

MYERS: Are those names -- who do those names belong to?

LETBY: They relate to children that I was caring for at that time.

MYERS: Not children on this indictment?

LETBY: No.

MYERS: And are those the same names that appear on Thursday the 12th as well?

LETBY: No, so on the Thursday the one name is a student that I was mentoring and the other one is a baby.

MYERS: Right. So as to the babies that appear, the two on the 11th and the one on the 12th, again why did you put -- make a note of their names?

LETBY: So for my own reflection, I've done something with those babies perhaps for the first time or... yeah.

MYERS: If we just look across on the 14th, on the top of the opposite side, again there's two names there.

LETBY: That's the same. One of the names is with reference to a student and the other one is a patient.

MYERS: And why would you make a reference to the student in here?

LETBY: I would document whenever I worked with a student because you have to keep records of who you've mentored and when. That's just part of my career development.

MR MYERS: Thank you for going through those with us, Ms Letby.

I wonder, my Lord, if we could take a break at that point.

MR JUSTICE GOSS: Certainly. Yes, we'll have a 15-minute break now, members of the jury.

(In the absence of the jury)

MR JUSTICE GOSS: Yes, general public, please leave.

(3.10 pm)

(A short break)

(3.23 pm)

MR MYERS: Just before the jury return, we're endeavouring to sit for about an hour, take a 15-minute break and then sit for a further hour and in the normal course of events that means we would finish round about 4.15. I ran on a little bit there because I wanted to get to the end of the diary entries. May I pick a time around 4.15? That is around the time scale we were working with rather than running for an hour from now because that --

MR JUSTICE GOSS: Yes. That's absolutely fine.

MR MYERS: That would be very helpful. We might be a little short of it, but I'll aim for that.

MR JUSTICE GOSS: Just what's a convenient and natural break.

MR MYERS: I'm grateful. Thank you, my Lord.

MR JUSTICE GOSS: All right.

(In the presence of the jury)

MR MYERS: Ms Letby, we're going to continue with items that were recovered from the searches that took place. So the next item I would like to go to is one of the pieces of paper that we saw enclosed within that 2016 diary. It's on page 20 of the prosecution images. There's two page 20s, one for the back and one for the front, so I'm going to see which one we get first.

Is this something that would have been written all in one go or is it not?

LETBY: No, it's likely that it would have been done over several occasions.

MYERS: This is a piece of paper which had actually been folded up and tucked inside the diary, hadn't it?

LETBY: Yes.

MYERS: Again, I'm not proposing to go through everything on this, but we'll just look at the top and the bottom halves, just a couple of items to get a feel for it, so I am going to ask Mr Murphy if he could enlarge the top half of this, please.

I'm going to pick out some of the words, because it's a collection of words and names. Just at the top, an inch or two in as it appears in the image from the left we can see the word "audit". Can you see that, "audit"?

LETBY: Yes.

MYERS: What's audit got to do with anything?

LETBY: So I think this is started off as a work-based note for the office role that I was doing at the time, which is where you see words like "documentation" and "management".

MYERS: You tell us, where can we see "documentation"? I can see it, but you help us to see it. It just moved then actually.

LETBY: We've got "documentation" here (indicating). We've got "workforce scheduling", "management".

MYERS: Yes.

LETBY: So I think it started off as a work-based note.

MYERS: Right. We can see "time frame" where you've got the cursor there, if we just move to the right, you've got "time frame" written there.

LETBY: Yes. I've got "procedural verification", lots of things related to my role at that time.

MYERS: In the non-clinical role that you were in?

LETBY: Yes.

MYERS: What was that non-clinical role, please?

LETBY: So it was within the risk and patient safety team, so it was looking at complaints that had been put into the trust and clinical incidents that had gone in. It was an office-based role.

MYERS: All right. The area I'm going to go to, it's all there, is what on this sheet is the bottom left-hand quadrant, the lower left quadrant. In fact, if we look at it here and then we can see an enlargement, Mr Murphy's got it there, that's the area. Can you see that?

LETBY: Yes.

MYERS: There's an enlargement of that at page 21. Thank you, that perhaps does as well. But we have it at page 21 too. Let's have a look at this. The writing is in different directions, isn't it?

LETBY: Yes.

MYERS: I'm going to -- in fact, is it possible to turn this round 180 degrees, please, Mr Murphy? Thank you.

Just looking at this as it appears here, again, "Bombay". What does Bombay refer to at the top?

LETBY: So that was -- I used to go to a quiz night and that was the team name.

MYERS: Right. A pub quiz?

LETBY: Yes.

MYERS: Looking across on the left-hand side, is that your signature coming in at an angle on the left --

LETBY: Yes.

MYERS: -- "Lucy Letby". Are you able to move the cursor, Ms Letby, so I know and the jury know we're talking of the same thing?

LETBY: This here are my initials and my signature and my name (indicating).

MYERS: If you look across from that we can see "Lappalainen" and Minna, her name?

LETBY: Yes.

MYERS: Why would you have written that in there, do you think?

LETBY: I would write the names of people that are important to me and just people on my mind.

MYERS: Who's Kath Close if we carry on down the right-hand side?

LETBY: That was one of my teachers from high school that I'm still friendly with.

MYERS: We can see there's a section here which has been crossed out in the middle of it; can you see that?

LETBY: Yes.

MYERS: If we turn this 90 degrees to the right and enlarge it, it might be difficult at first to see with the crossings over it. Can you assist us with what it was you had written on there before it was crossed out, one assumes?

LETBY: No, I couldn't say from memory.

MYERS: Okay. Can I assist you? You tell me if this looks right. Does the first bit say "I don't"?

LETBY: Yes, it looks like I don't know.

MYERS: I don't know if what?

LETBY: "If I killed them."

MYERS: "I don't know if I killed them."

All right. Then under that?

LETBY: "Maybe I did."

MYERS: "Maybe I did."

LETBY: "Maybe this is all down to me."

MYERS: Yes. Why would you have written something like that in the middle of this note?

LETBY: That's how I was feeling at that time.

MYERS: Yes. Then why is it crossed out like it is?

LETBY: That's just something I would do, I would cross out certain things.

MYERS: How did it make you -- sorry, I interrupted. You would cross out certain things?

LETBY: Yeah, it was a way of me processing things and dealing with things.

MYERS: How did it make you feel wondering maybe, did I kill them? How did that make you feel?

LETBY: I hated myself.

MYERS: The allegation is that you intended to hurt these babies either by killing them or trying to kill them. You understand that, don't you?

LETBY: Yes.

MYERS: Here you're saying, "Maybe I killed them, maybe I did, maybe this is all down to me". To be clear, did you do anything intending to hurt anyone?

LETBY: No, never.

MYERS: Why were you questioning yourself here with this maybe wording?

LETBY: Because that's how I'd been made to feel, that I had done something wrong.

MYERS: How easy is it to control the different thoughts you have when you were feeling the way you were feeling at this time?

LETBY: It's not, they're very random, very sporadic. That's just... As they came to my mind, how that's they would be written down. There's no structure to them as such.

MYERS: If we just pull back a little bit from this enlargement, Mr Murphy, just above that.

Just at the top left-hand corner, in the bit that's crossed out it says, "I want to die". Is that how you felt?

LETBY: Yes.

MYERS: Why did you feel like that?

LETBY: Because I did. I couldn't see how my life was ever going to be the same again. I didn't want to live with the life that I had at that time.

MYERS: Can we go, please, to page 20. Sorry, in other words the back of this piece of paper. This is one side of the piece of paper. There are two image 20s and I'm asking to go to the back of this one. Next page along, please.

This is the back of that piece of paper that was tucked in your diary. If we just enlarge the top half first and briefly. It's talking about:

"No formal debrief process but staff available if needed. Have a quick safety brief prior to clinic list."

And so on. What's that type of wording relating to?

LETBY: That is in relation to my office role at that time.

MYERS: If we scroll down just below where the page is currently split, thank you. In the midst of all of this office speak, we can see "Help me". "Help me"; why have you written that in there?

LETBY: Because that's what I wanted.

MYERS: To the left of the lower "help me", what's the word that's circled, can you tell?

LETBY: Tired.

MYERS: Is that how you felt?

LETBY: Yes.

MYERS: I'm going to ask to take that down and ask you about some other papers now, please. We've heard from the police officer who dealt with the paper exhibits that by the time the police had counted them, there were 257 handover sheets that you were in possession of, Ms Letby.

LETBY: Yes.

MYERS: Before they'd been counted after your arrest, did you know how many handover sheets you had?

LETBY: No.

MYERS: Did you have them all in one place?

LETBY: No.

MYERS: Before the police came, could you have said where all of them were?

LETBY: No.

MYERS: Can you explain to us, first of all, how a handover sheet could end up going from work to being at wherever you were living?

LETBY: It stayed in the pocket of my uniform and come to my home address with me.

MYERS: Did you put it in your pocket for any particular reason?

LETBY: That's where it always is on shift. It would be in my pocket.

MYERS: Is there any particular reason why it would be left in your pocket when you come home?

LETBY: Just that I haven't disposed of it prior to leaving.

MYERS: So if you did take a handover sheet home like that, what would you do with it?

LETBY: It would just get put somewhere.

MYERS: Anywhere in particular?

LETBY: No.

MYERS: Did you do anything with it when you got it home?

LETBY: No.

MYERS: Of course, we know that this is a total of 257 handover sheets.

LETBY: Mm.

MYERS: Some of which relate to children on this indictment. Did you ever think to yourself, blimey, I've got a lot of handover sheets, I should get rid of them?

LETBY: No. I really didn't know I had that many. They were in lots of different locations, they just got put there and were forgotten about.

MYERS: Did they serve any purpose for you once they were at home?

LETBY: No.

MYERS: Did you do anything with them?

LETBY: No.

MYERS: Did you think of them very often?

LETBY: No.

MYERS: Did you think of them at all?

LETBY: No.

MYERS: We've seen there's a shredder that was in the bedroom, bedroom 3, at 41 Westbourne Road. There's a photo of the black shredder.

LETBY: Yes.

MYERS: Now as it happens, in the overarching interviews, the ones that we read at the end of the process, in the third one you had made a comment to the police that you didn't have a shredder.

LETBY: Mm.

MYERS: That's not right, is it?

LETBY: No.

MYERS: You did have a shredder?

LETBY: Yes.

MYERS: At the time of your arrest, how long had you had that shredder for as far as you can remember?

LETBY: Not long. It was fairly recent.

MYERS: Were you trying to hide the fact you had a shredder when you said to the police you didn't have one?

LETBY: No.

MYERS: Then why did you say you didn't have one?

LETBY: Just an oversight on my part.

MYERS: I beg your pardon?

LETBY: It was just an oversight. I had forgotten that I did have one.

MYERS: Do you agree that there are some bits of bank statements that have been shredded that we've seen on the photograph?

LETBY: Yes.

MYERS: But was it used for shredding handover notes?

LETBY: No.

MYERS: Did you think of shredding handover notes that were in your possession?

LETBY: No.

MYERS: Or any of the 257 of them that were there when the police came?

LETBY: No, they're just parts of numerous amounts of paper that I accumulated and didn't do anything with.

MYERS: So in terms of numerous bits of paper you accumulate, is it just handover notes that you accumulate?

LETBY: No, I collect -- I keep a lot of paper things. I have difficulty throwing anything away, so...

MYERS: How good are you at throwing away bits of paper?

LETBY: I'm not at all.

MYERS: Roughly when were you first aware, when did it cross your mind that the police might be involved in what was being said about you and the unit?

LETBY: When I found out what the allegations were.

MYERS: And when was that?

LETBY: Towards the end of 2016.

MYERS: That's when it first crossed your mind?

LETBY: Yes.

MYERS: Right. Did you think they might get involved?

LETBY: Yeah.

MYERS: Thinking they might get involved, did it ever cross your mind to shred these notes?

LETBY: No, because I really didn't remember that I had them.

MYERS: When you were working on the neonatal unit, when you went to work, what bags did you take with you to work with and come back with at the end of the day?

LETBY: I would have a handbag and then just another general shopping bag.

MYERS: What would the general shopping bag be used for?

LETBY: So for my uniform, for my lunchbox. Just general work-related items.

MYERS: I'm going to ask if we could put up, please, the photograph at image 25 or at page 25 in the prosecution images, Mr Murphy. Thank you.

Do you recognise this bag?

LETBY: Yes. That was one of my work bags.

MYERS: This is -- it's been described as a Morrisons bag.

LETBY: Yes.

MYERS: It was recovered by the police from under your bed in fact, wasn't it?

LETBY: Yes.

MYERS: We also know we're going to see in a moment an image of an Ibiza bag.

LETBY: Yes.

MYERS: Did those two bags have a similar purpose when you used them?

LETBY: Yes, the Ibiza bag replaced this bag.

MYERS: Right. Let's start with this one then, this bag. What did you use it for when you did use it?

LETBY: So that would be for taking my uniform to work and, like, my lunchbox, just any work-related folders, shoes.

MYERS: So you told us that you would take a handbag to work and then a bigger bag with items in it?

LETBY: Yes.

MYERS: So this is the bigger bag you took over a certain period of time?

LETBY: Yes.

MYERS: And this bag was, did you say, eventually replaced by another bag?

LETBY: Yes.

MYERS: And replaced by which bag?

LETBY: The Ibiza bag.

MYERS: In this bag when the police came it contained, we're told, 31 handover notes and 17 of them related to babies on this indictment. Do you recall or know how those notes ended up in this bag?

LETBY: No.

MYERS: Or when they did?

LETBY: No.

MYERS: Or why they did?

LETBY: No, they came back by accident and stayed in the bag.

MYERS: For that matter, do you know why it contained 14 handover sheets that are unrelated to the babies that appear on this indictment?

LETBY: Because that's just a general pattern of behaviour, sometimes handover sheets would come home with me.

MYERS: Right. Any idea why those 14 that aren't related to this indictment ended up in this bag?

LETBY: No.

MYERS: And then can we put up, please, the image at page 22. This has been described as the Ibiza bag; yes?

LETBY: Yes.

MYERS: This is the one that replaced the Morrisons bag, is it?

LETBY: Yes.

MYERS: Just by way of summary, this bag contained a number of handover notes, including handover notes relating to [Baby Q], [Baby P] and [Baby O].

LETBY: Yes.

MYERS: Was this the bag you were using right up until the time you finished working on the neonatal unit?

LETBY: Yes, it was.

MYERS: Do you know how handover notes relating to those babies or any other notes for that matter ended up in this bag?

LETBY: I've inadvertently brought them home from work.

MYERS: [Baby Q], [Baby P] and [Baby O] are babies that you looked after towards the end of your period on the neonatal unit, aren't they?

LETBY: Yes.

MYERS: So would this bag have gone to work with those notes in it at some point or come back from work with those notes in it, do you know? Can you help us?

LETBY: I couldn't say.

MYERS: Can you help us with how they came to be in this bag in the first place?

LETBY: Because that was my general work bag at that time.

MYERS: Right. Once they were in this bag and they're at your house, did you do anything with them?

LETBY: No.

MYERS: Did you go back into the bag after you'd come back for the last time from that unit?

LETBY: No, I never went in that bag again.

MYERS: How long do you say they would have been sitting there by the time the police came in 2018?

LETBY: From my last day -- working day on the unit.

MYERS: Could we have a look, please, at the image on page 47, which is an image of some shelves at your parents' house, Ms Letby.

Just pause for a moment and take a look at this. This is a cupboard at your mum and dad's house, isn't it?

LETBY: Yes, it's in my bedroom at my parents' house, yes.

MYERS: That's the bedroom you used to use at your parents' house?

LETBY: Yes.

MYERS: Can we see up at the top, on the shelf at the top, there's a cardboard box? Can you see that?

LETBY: Yes.

MYERS: It says -- what looks like the word "keep" written on it; yes?

LETBY: Yes.

MYERS: And then under that, upside down, "Five-sheet strip cut paper shredder".

Just to remind us all, this box contained five handover sheets when the police searched this house on 3 July 2018?

LETBY: Yes.

MYERS: Just to remind us, five sheets unrelated to children on this indictment. Just to remind everybody.

The box, what shredder did that box relate to?

LETBY: The shredder at my parents' home.

MYERS: Is that the box for the shredder that was at your house when the police went?

LETBY: No.

MYERS: So it's a different one?

LETBY: Yes.

MYERS: Why were there five handover sheets for babies not on this indictment in that box in July 2018?

LETBY: I'm not sure how they got there. They've just been placed there.

MYERS: Had you ever had items of yours at your mum and dad's house whilst you'd been working at the Countess of Chester Hospital?

LETBY: Yes.

MYERS: In what circumstances had you had them at your mum and dad's house?

LETBY: What do you mean, sorry?

MYERS: Why were items at your -- we heard you were living in Ash House and then you moved out, then you moved back, then you went to Westbourne Road. So how would your mum and dad's house feature in all of that?

LETBY: Those were all temporary accommodations, so I never fully moved out of my parents' house and items would come back and forthwith me when I moved to different locations.

MYERS: I am not saying it's the same thing, but a bit like when a student is moving around and their things move with them and things go back to their mum and dad's house, like that?

LETBY: Yes, where I lived was very small, so...

MYERS: At the time you were arrested were these five sheets in this box things that were in your mind?

LETBY: No, not at all. I didn't know I had them.

MYERS: Had you thought of them much?

LETBY: No, not at all.

MYERS: Who wrote "keep" on it?

LETBY: I'm not sure. That could be probably me when I've been moving locations, or my mum or dad.

MYERS: Why would you write "keep" on it?

LETBY: To keep the shredder. So it's in relation to the shredder itself.

MYERS: Whose shredder was it?

LETBY: Mum and dad's.

MR JUSTICE GOSS: Sorry, was the shredder in the box?

MR MYERS: I don't recall that it was, my Lord.

LETBY: I'm not sure.

MR MYERS: I think the evidence is the only thing in the box were the five handover sheets.

MR JUSTICE GOSS: Yes, that's why I understood.

MR MYERS: That's what we understand it to be.

MR JUSTICE GOSS: So you think if you wrote "keep", and you are not saying that is necessarily you that wrote "keep" on it; is that right?

LETBY: It looks like I've written it.

MR JUSTICE GOSS: It looks like your writing? So if you have written "keep" --

LETBY: That would be in relation to (overspeaking) --

MR JUSTICE GOSS: -- it's relating to keeping the shredder in the box?

LETBY: Yes.

MR JUSTICE GOSS: Right.

MR MYERS: But in any event, is this your shredder or not that that box relates to?

LETBY: No.

MYERS: That deals with various items that are recovered from the houses and items from the police searches and a good deal with the notes, Ms Letby, although we'll be returning to some other items like that as we go along.

The next thing we're going to turn to is the allegations themselves. Before we do that, just some questions about them and the process.

When it comes to trying to recall the detail of what's happened 7 or 8 years ago, is it easy to remember everything?

LETBY: No. There are some things that I do have a clear memory of, other things where I have some memory, and others where I don't have any memory at all.

MYERS: Where you do have memories, just to be clear, are all the memories as clear as one another?

LETBY: No. Some of them have deteriorated over time.

MYERS: Right. We've heard some or a number of prosecution witnesses come and say on various occasions that they do not remember certain details or events clearly.

LETBY: No.

MYERS: Are you any different from that?

LETBY: No.

MYERS: We've heard prosecution witnesses, a number of them, come and say on occasion that they don't remember events or details as well now as they did nearer to the time. Are you any different from that?

LETBY: No, that's the same for me.

MYERS: When you read notes, does that sometimes assist in bringing back memories?

LETBY: Yes, at times, yes.

MYERS: When you were interviewed by the police after your arrest on 3 July 2018, had you ever experienced anything like that before?

LETBY: No.

MYERS: We've heard from Detective Sergeant Stonier that you did have access to some of the notes relating to some of the children you were interviewed for --

LETBY: That's right.

MYERS: -- before the interview.

LETBY: Yes.

MYERS: That would tend to be nursing notes where you'd made them; yes?

LETBY: Yes, it was predominantly notes that I had made or signed for myself, yes.

MYERS: And then sometimes also observation charts or intensive care charts. Did you see them?

LETBY: Yes.

MYERS: But I don't think there's any dispute, it was nothing like the range of material that we're looking at in this case, was it?

LETBY: No.

MYERS: And you'd have the opportunity, I'm not going to ask you to go into the details, to speak with your solicitor before each of the interviews?

LETBY: Yes.

MYERS: And how long would that go on for, that pre-interview consultation, approximately?

LETBY: Um... Maybe half an hour, an hour.

MYERS: All right. The interviews, we've got them in agreed fact 32, but there were 13 tapes of interview between the 3rd and 5 July. That totalled 9 hours and 26 minutes or thereabouts. I'm sure my maths can be checked.

LETBY: Yes.

MYERS: There were 14 interviews and tapes after the second arrest on the 10th to 12 June. That totalled 9 hours and 12 minutes.

Then after the third arrest, between the 10th and 11 November, a total of 3 hours and 9 minutes.

So within in excess of 21 hours you were interviewed for.

In general, as you went through those interviews, how easy was it to call up detail for the various questions the police asked you?

LETBY: It was extremely difficult.

MYERS: How much did you rely upon what the police said had happened to help you explain what had happened?

LETBY: I heavily relied on that.

MYERS: We're going to look at the events on this indictment, Ms Letby. You understand, don't you, the allegations are of murder and attempted murder?

LETBY: Yes.

MYERS: I'm not going to repeat the allegation every time, but so we can be quite clear, let me ask you now: have you ever tried to kill any baby you have cared for?

LETBY: No.

MYERS: Have you ever intentionally harmed or tried to intentionally harm any of the babies as alleged?

LETBY: No, never.

MYERS: Have you ever introduced air intravenously or forced air down a nasogastric tube?

LETBY: No, I haven't.

MYERS: Have you ever done that with the intention of killing a baby?

LETBY: No.

MYERS: Or for any other reason for that matter?

LETBY: No.

MYERS: You're shaking your head.

LETBY: No.

MYERS: Have you ever overfed a baby with the intention of killing him or her?

LETBY: No, never.

MYERS: Or ever done anything like that to a baby for any other reason?

LETBY: No.

MYERS: Have you ever used insulin with a baby with the intention of killing the baby or harming him or her in some other way?

LETBY: No.

MYERS: Have you ever committed a physical assault on any baby in your care with the intention of killing him or her?

LETBY: No.

MYERS: Or hurting him or her?

LETBY: No, never.

MYERS: Have you ever done anything intentionally to hurt any baby you've been looking after?

LETBY: No.

MYERS: What have you wanted to do for the babies you've been looking after?

LETBY: To care for them, to do my best for them, to help them.

MR MYERS: My Lord, I'm going to turn to [Baby A] and [Baby B]. It's a little earlier than expected. I'm quite content to make a start if the court is, but it's unlikely I will get to the conclusion of it. I just wonder, with the density of detail today and the break that we've got before I pick it up in 2 days' time, whether it might be better --

MR JUSTICE GOSS: Unfortunately, by force of circumstances, we're only going to have one more day this week and then 2 days next week, so there are going to be significant interruptions in any event. So if you feel that you are able to deal with a certain amount today, I think it would be helpful. Because otherwise we lose time that is quite precious at the moment. But if Ms Letby is content to continue? You're going to have a two-day break now in any event; right?

MR MYERS: I should say, my Lord, the reason I hesitate, and I appreciate the requirement to use the time as best we can, but the problem I have is if I begin with [Baby A] and get so far with it, I'm most unlikely to conclude that within 10 or 15 minutes. It just concerns me then where we pick it up from when we come back. Certainly for my part, I would much prefer it if we would start afresh with [Baby A] on Friday and begin with the allegations then rather than commence them now part of way and then stop. I do appreciate the need to move on, but I wonder really how efficient it's going to be when I'm going to have to

recap some of the material to satisfy myself at least that Ms Letby understands what we're dealing with.

MR JUSTICE GOSS: All right.

MR MYERS: (Overspeaking) a reckless waste of court time, it is not meant to be, my Lord, we've dealt with a good deal, but the detail that follows now is quite packed and I'm concerned about beginning part of the cross-examination and then concluding the rest of it on this issue.

MR JUSTICE GOSS: All right. I'm not going to press you, Mr Myers.

MR MYERS: I'm grateful, my Lord, thank you.

MR JUSTICE GOSS: You've heard where we are going to go on Friday.

MR MYERS: I'm obliged, my Lord.

MR JUSTICE GOSS: It's all right, Mr Myers.

I've reminded you of what you are well aware in any event: we're not sitting tomorrow or Thursday. The next sitting day is Friday and next week we're only sitting 2 days. You have the sheet of paper.

I've already reminded you today about your responsibilities as jurors. Please adhere to them. As you'll appreciate, as time goes on, you gather more and more information, as I told you that you would, and things will be going through your heads about this in any event, and will have been for some time, I expect. Keep your thoughts to yourselves and I'll see you at 10.30 on Friday morning. Thank you very much indeed.

(In the absence of the jury)

MR JUSTICE GOSS: I think everyone is aware of the sitting days next week, aren't you? Everyone who needs to know about it. That we are obviously not sitting on Monday, it being a public holiday, or Tuesday or Wednesday. So after Friday of this week, the next sitting day will be Thursday of next week. All right? Thank you very much.

Have counsel received a copy of my ruling or not?

MR JOHNSON: Yes, thank you.

MR JUSTICE GOSS: Thank you very much. It will be uploaded to the DCS and copies will be provided to those who request it --

MR MYERS: Thank you, my Lord.

MR JUSTICE GOSS: -- Friday's ruling, the reasons for it. You asked for it, you shall receive it. Thank you very much.

Could members of the public now please leave the court because that is the end of the sitting for today.

(3.59 pm)

(The court adjourned until 10.30 am on Friday, 5 May 2023)