

**PHILIPPA C. JACKSON**  
*Consultant Plastic Surgeon*

## MEDICAL REPORT

For the Court  
By Miss Philippa C. Jackson  
BSc, MBBS, FHEA, MSc, FRCS (Plast)

|                         |   |
|-------------------------|---|
| Case                    | [REDACTED]  |
| Date of Examination     | [REDACTED]  |
| Location of Examination | [REDACTED]  |
| Date of Report          | [REDACTED]  |
| Area of Expertise       | Plastic Surgery   |
| On Behalf of            | [REDACTED]  |
| On the Instruction of   | [REDACTED]  |
| Solicitor Reference     | [REDACTED]  |
| Our Reference           | [REDACTED]  |
| Subject Matter          | Condition and Prognosis   |
| Written by              | Miss Philippa C Jackson<br>Litfield House Medical Centre<br>1 Litfield Place<br>Bristol BS8 3LS |

## CONTENTS

| <b>Paragraph Number</b> | <b>Paragraph Contents</b>              |
|-------------------------|--|
| 1                       | Introduction and Issue To Be Addressed |
| 2                       | Methodology                            |
| 3                       | Claimant Details                       |
| 4                       | Accident Details                       |
| 5                       | Impact of Injuries/Symptoms            |
| 6                       | My Opinion and Prognosis               |
| 7                       | Statements                             |

### **Appendices**

|   |                                  |
|---|----------------------------------|
| 1 | My Qualifications and Experience |
| 2 | List of documents examined       |
| 3 | Glossary of technical terms      |

# REPORT

## 1.0 Introduction & Issue to be Addressed

### 1.1 The writer

I am Miss Philippa Clare Jackson. I qualified in medicine in 2006 (GMC 6143070) and entered the field of Plastic and Reconstructive Surgery in 2011. I completed specialist training in 2018 and became a substantive consultant the same year. I am a Fellow of the Royal College of Surgeons of England (Plastic Surgery) and am on the General Medical Council Specialist Register for Plastic Surgery. I am a Consultant Plastic Surgeon with subspecialty interest in Oncoplastic and Breast Reconstruction. Part of my responsibilities include the treatment and care of patients with soft tissue injuries.

I have a BSc in Healthcare Ethics and Law from King's College London (2004). I have completed the Royal College of Surgeons of England course 'Legal Aspects of Surgical Practice', and a course on writing medicolegal reports accredited by the Royal College of Surgeons of England. Full details of my qualifications and experience entitling me to give expert opinion can be found in Appendix 1.

### 1.2 Summary Background of the Case

I have been asked to provide a report by [REDACTED], on behalf of the instructing solicitor [REDACTED], in relation to injuries sustained by [REDACTED] that occurred on [REDACTED]. I have been specifically asked to include in my report an assessment of pre-accident medical history, injuries sustained, treatment received and present condition. I have been asked to comment on the capacity for work and give a prognosis. I was asked to interview and examine the claimant, and comment where appropriate on the medical records provided to me (see Appendix 2).

### 1.3 Summary of My Conclusions

The following has been summarised from supplied medical notes and interview with the claimant.

It is my opinion that [REDACTED] sustained a laceration to the **vertex** of the scalp resulting in a scar on [REDACTED]. This was caused by a piece of wood falling on him at work and this is consistent with the injury.

[REDACTED] scar is permanent, and improvement is unlikely in the future without surgical or non-surgical intervention.

## 2.0 Methodology

## 2.1 Statement of Compliance

I understand my duty as an expert witness is to the court. I have complied with that duty and will continue to comply with it. This report includes all matters relevant to the issues on which my expert evidence is given. I confirm that I have made clear where facts and matters in this report are within my knowledge and which are not. I have provided details in this report of any matters which may affect the validity of the report. I have addressed this report to the court. I further understand that my duty to the court overrides any obligation to the party from whom I received instructions.

## 2.2 The following information has been used to compile this report:

- Medical records supplied by the instructing solicitor (see Appendix 2)
- Consultation with the claimant

## 2.3 Technical Terms and Explanations

Any medical terms will be highlighted in bold and included in Appendix 3 with explanation of the terminology and images where appropriate.

## 3.0 Claimant details

### 3.1 The Claimant

██████████ is █████ years old (DOB ██████████). The claimant lives at ██████████ and was seen today at Litfield House Medical Centre. The claimant currently works as a ██████████. He previously worked as a ██████████. Identification was confirmed using driving license and passport. The photographic identification provided was a true likeness of the claimant and I am happy to confirm their identity.

### 3.2 Employment at time of injury

██████████

### Current employment (if different)

██████████

### 3.3 Time off work

██████████ required one week off work to recover from the injuries.

## 4.0 Accident Details

### 4.1 Accident summary

Whilst at work ██████████ was moving a pallet which was supporting some wood he was spraying. The wood fell and hit ██████████ on the head causing a laceration to the scalp.

██████████ had pressure applied to his wound and he was taken to hospital by one of the managers. He did not lose consciousness.

██████████ was not wearing any protective head gear.

#### 4.2 Injuries/Symptoms

██████████ sustained a laceration to the scalp.

██████████ also complains of symptoms related to a head injury which has been the subject of another report [██████████ report].

██████████ suffered a strain to his neck which has been the subject of another report [██████████ report].

#### 4.3 Treatment received

██████████ received first aid in the form of pressure with a rag at the time of the injury.

██████████ attended ██████████ where he had the wound cleaned and sutured.

I note ██████████ subsequently attended and underwent a CT scan of his head.

██████████ GP removed the sutures on ██████████. He estimates healing took 2 weeks.

#### 4.4 Medical records review

Review of the GP medical records revealed a history of asthma for which ██████████ takes inhalers and depression in the past. He is an ex-smoker. He has recently suffered a deep vein thrombosis and is taking anti-coagulants. There is no other medical history of note.

#### 4.5 Examination findings

██████████ has a linear scar running parallel to the midline on the left side of the **vertex** of his scalp in a **sagittal** plane. The scar was measured today as 4cm in length. The scar is thin and white in appearance.

██████████ scar sits in an area of relatively sparse hair coverage and is therefore easy to see when he is in a seated position.

The scar is well healed. ██████████ tells me the surrounding skin has normal sensation and it is pliable.

The scar has a stepped feel with one edge sitting higher than the other.

#### 5.0 Impact of injuries/symptoms

5.1 Current physical disability

██████████ has no physical disability related to the scar on his head.

5.2 Impact on work

██████████ went back to work in the same role 1 week after the injury. After some time he was moved to another job in the same company for lighter duties.

██████████ chose to leave his job after 27 years in ██████████ as a result of the injury. He has recently started another job in a new company.

The scar on his head will not impact ██████████ ability to carry out his work.

5.3 Psychological impact of injury/symptoms

██████████ describes feeling frustrated and upset at the effects of the incident which includes the impact of the scar.

██████████ has been called ██████████ by colleagues and friends as a result of the injury.

██████████ describes feeling anxious at work and concerned about something falling on him.

5.4 Impact on leisure activities

██████████ has not described any impact on his leisure activities.

5.5 Other consequences of the injury/symptoms

There are no other consequences of note.

**6.0 My Opinion and Prognosis**

6.1 My Opinion and Prognosis

██████████ sustained a laceration to his scalp on ██████████ when a piece of wood fell on him at work.

The scar on ██████████ head is permanent and will not improve in the future without surgical or non-surgical intervention.

6.2 Job prospects

██████████ job prospects are unaffected by the scar on his head.

6.3 Future treatment

Scar therapy

██████████ may benefit from a period of scar therapy. A new appointment with a scar therapist would cost approximately £100. A follow-up appointment would cost approximately £50.

#### Scar revision

If the uneven nature of the scar bothers ██████████ he could undergo scar revision under a local anaesthetic. There is a risk that the scar is the same or worse after the procedure. The surgery would cost approximately £750-£1000. Other risks include bleeding, infection, stretched scar, and ongoing lumpiness.

### 7.0 Statements

#### 7.1 Statement of Conflicts

I confirm that I have no conflict of interest of any kind, other than any that I have already set out in this report. I do not consider that any interest that I have disclosed affects my suitability to give expert evidence on any issue on which I have given evidence. I will advise the party by whom I am instructed if, between the dates of this report and the trial, there is a change in circumstances which affects this statement.

#### 7.2 Declaration of Awareness

I confirm that I am aware of the requirements of Part 35 and Practice Direction 35, the Protocol for the Instruction of Experts to give Evidence in Civil Claims, and the Practice Direction on Pre-Action Conduct.

#### 7.3 Statement of Truth

I confirm that I have made clear which facts and matters referred to in this report are within my own knowledge and which are not. Those that are within my own knowledge I confirm to be true.

The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer.

I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signature

*Philippa C. Talbot*

Date

██████████

## APPENDICES

### 1 My Qualifications and Experience

#### Professional Registration Details

GMC: 6143070 (Specialist Register for Plastic Surgery)

MPS: 296655

BMA: 7983976

ICO: ZA197067

#### Current Appointment

Consultant Plastic Surgeon

North Bristol NHS Trust

#### Qualifications

BSc, MBBS, FHEA, MSc, FRCS (Plast)

#### Experience

- Specialist UK Plastic Surgery training 2011-2018
- Oncoplastic Training Interface Group Fellowship 2017-2018
- Microsurgery Breast Reconstruction Fellowship 2018
- Substantive Consultant Post 2018 – date (North Bristol NHS Trust)
- Completion of Medicolegal CPD including Royal College of Surgeons accredited Medicolegal Report Writing course and Legal Aspects of Surgical Practice
- Intercalated BSc in Healthcare Ethics and Law 2:1, King's College London
- Medicolegal report writing for agencies and direct for solicitors

See attached CV for additional information.

### 2 List of Documents Examined

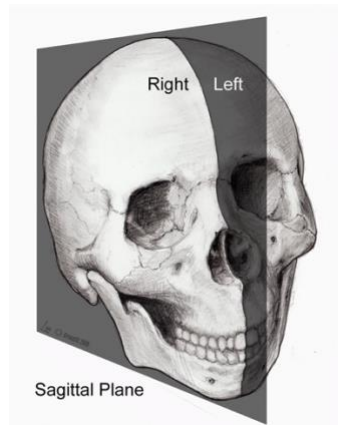
- GP record summary
- Hospital records from Leicester Royal Infirmary for this incident
- Mr Gupta medical report

### 3 Glossary of Technical Terms

Sagittal

The sagittal plane is an anatomical descriptor. It runs from front to back as shown in the image below and divides the body into a right and a left side.

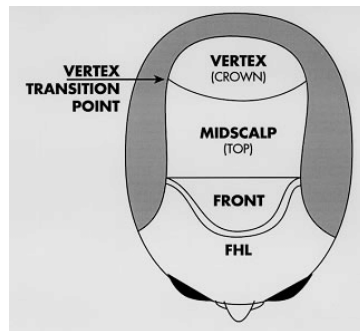




Vertex

Taken from <https://www.crossfit.com/essentials/anatomical-planes-axes>

The vertex of the scalp is also sometimes referred to as the crown.



Taken from [https://www.researchgate.net/figure/Regions-of-the-scalp-anterior-to-the-vertex-transition-point\\_fig3\\_267866808](https://www.researchgate.net/figure/Regions-of-the-scalp-anterior-to-the-vertex-transition-point_fig3_267866808)