



Trust Headquarters
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4 Gatwick Road
Crawley
West Sussex
RH10 9BG

Tel: 0300 123 0999
www.secamb.nhs.uk

1st July 2026
Internal Reference: 260627
Email:

Dear ,

Thank you for your request for information, which we received on **11/06/2026**.
We have considered your request under the Freedom of Information Act 2000.
Please ensure you quote the Internal Reference number above in any future correspondence.

Your Request and Formal Response

Please provide the command structure and operational command records relating to the incident on 19 July 2024 concerning Paloma Scarlet Shemirani.

Specifically, I request:

The name, clinical grade and role of the Operational Team Leader (OTL) responsible for the incident.

Section 21 of the Freedom of Information Act 2000 provides that information is exempt from disclosure where it is reasonably accessible to the applicant by other means.

In this case, some of the information you have requested is already publicly available and can be accessed via the following link(s): FOI-260430-Clinical-Role-and-Scope-of-Practice-at-Incident.pdf

As the information is reasonably accessible, the Trust is not required to provide it again in response to your request.



The names and any information that could identify individual members of staff have been withheld under Section 40(2) of the FOIA.

This information constitutes personal data under the UK General Data Protection Regulation (UK GDPR). Disclosure would be unfair and unlawful as it relates to identifiable individuals performing their duties in a specific and sensitive operational and clinical context.

The Trust considers that disclosure of this information would contravene the first data protection principle (lawfulness, fairness and transparency). This exemption is therefore absolute and not subject to a public interest test.

Information has also been withheld under Section 38(1)(a) and (b) of the FOIA, as disclosure would be likely to endanger the physical or mental health and safety of individuals.

This exemption applies to the identification of staff involved in the incident.

The Trust considers that disclosure could expose staff to the risk of harassment, undue attention, or other harm, particularly given the specific incident and identifiable circumstances referenced in the request.

This is a qualified exemption and is subject to the public interest test. The Trust recognises the public interest in transparency and accountability regarding operational responses. However, this is outweighed by the need to protect the safety and wellbeing of staff and to ensure that they are able to carry out their duties without fear of harm or reprisal.

The name, grade and role of the Duty Operational Commander (Bronze) responsible for the incident.

The names and any information that could identify individual members of staff have been withheld under Section 40(2) of the FOIA.

This information constitutes personal data under the UK General Data Protection Regulation (UK GDPR). Disclosure would be unfair and unlawful as it relates to identifiable individuals performing their duties in a specific and sensitive operational and clinical context.

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This is a qualified exemption and is subject to the public interest test. The Trust recognises the public interest in transparency and accountability regarding operational responses. However, this is outweighed by the need to protect the safety and wellbeing of staff and to ensure that they are able to carry out their duties without fear of harm or reprisal.

The role was an Operational Team Leader.

The name, grade and role of the Duty Tactical Commander (Silver), if one was appointed.

We do not hold this information as the tactical command team were not involved in this incident.

The name, grade and role of the Strategic Commander (Gold), if one was appointed.

We do not hold this information as the strategic command team were not involved in this incident.

The name and role of the clinician who authorised intraosseous access.

The Trust considers that the information requested relates to identifiable individuals involved in a specific episode of patient care and therefore constitutes personal data within the meaning of the UK General Data Protection Regulation. As such, this information is exempt from disclosure under Section 40(2) of the Freedom of Information Act 2000, as disclosure to the world at large would be unfair and unlawful. Where an individual is seeking access to information relating to their own care or treatment, this should be requested under data protection legislation as a Subject Access Request (SAR) or, where applicable, under the Access to Health Records Act 1990. We can confirm that requests for access to health records are managed separately by the Trust in accordance with these legal frameworks, and details of how to submit such a request are available on our website.

The name and role of the clinician who physically inserted the intraosseous device.

The Trust considers that the information requested relates to identifiable individuals involved in a specific episode of patient care and therefore constitutes personal data within the meaning of the UK General Data Protection Regulation. As such, this information is exempt from disclosure under Section 40(2) of the Freedom of Information Act 2000, as disclosure to the world at large would be unfair and unlawful. Where an individual is seeking access to information relating to their own care or treatment, this should be requested under data protection legislation as a Subject Access Request (SAR) or, where applicable, under the Access to Health





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The name and role of the clinician who authorised and administered each dose of adrenaline and every other invasive intervention.

The Trust considers that the information requested relates to identifiable individuals involved in a specific episode of patient care and therefore constitutes personal data within the meaning of the UK General Data Protection Regulation. As such, this information is exempt from disclosure under Section 40(2) of the Freedom of Information Act 2000, as disclosure to the world at large would be unfair and unlawful. Where an individual is seeking access to information relating to their own care or treatment, this should be requested under data protection legislation as a Subject Access Request (SAR) or, where applicable, under the Access to Health Records Act 1990. We can confirm that requests for access to health records are managed separately by the Trust in accordance with these legal frameworks, and details of how to submit such a request are available on our website.

Copies of the incident command log, command decision log, CAD audit trail, JESIP command records, escalation records, EOC records and any contemporaneous documents identifying who assumed command and at what times.

The operational command team were not involved in this incident so there is no incident command log, command decision log, JESIP command records.

All other information has already been provided to you as part of the Access to Health Records requests.

Any documents identifying changes in command responsibility during the incident.

The operational command team were not involved in this incident

SECAmb have already sent to you all relevant records that we hold, to which you are legally entitled, on 15th May 2025, 4th June 2025 (resend of our response of 15.5.25), 17th September 2025, 12th November 2025 and 29th December 2025.

We have nothing further to which you are entitled. We will not enter into further correspondence to repeat the same response.

Next steps

Some information held by the Trust is routinely published on our [website](#) and may be of assistance.





SECamb have already sent to you all relevant records that we hold, to which you are legally entitled, on 15th May 2025, 4th June 2025 (resend of our response of 15.5.25), 17th September 2025, 12th November 2025 and 29th December 2025.

We have nothing further to which you are entitled. We will not enter into further correspondence to repeat the same response.

If you are dissatisfied with the Trust's response to your request, you have the right to ask for an internal review.

Requests for an internal review should be submitted within **40 working days** of the date of this response and should be sent to:

Richard Banks, Head of Corporate Governance at FOI@secamb.nhs.uk

The internal review will be conducted by an individual who was not directly involved in handling your original request, ordinarily the Trust's Data Protection Officer. We aim to complete internal reviews within **20 working days** of receipt.

If you remain dissatisfied following the outcome of the internal review, you may complain to the Information Commissioner's Office (ICO). The ICO generally expects complaints to be raised promptly following the completion of an internal review.

The easiest way to raise a complaint is via the ICO's website:
www.ico.org.uk/foicomplaints

Alternatively, you may write to:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF

Yours sincerely,

Corporate Governance Team
South East Coast Ambulance Service NHS Foundation Trust

