


This is an addendum to a report by Dr Malcolm Coulthard on 07/07/2011

requested by the *Inquiry into Hyponatraemia-Related Deaths*
on the conduct of the paediatric nephrologists who cared for Adam Strain,
Dr (now Professor) Maurice Savage, and Dr Mary O'Connor

01/12/2011

Report by Dr Coulthard for Adam Strain death inquiry. Signed  1.

This addendum addresses 2 questions that have been raised from the Inquiry staff about statements I made in my report of 07/07/2011.

The first was the figure of "about 7 children" being transplanted annually in Belfast at that time, shown in bold below:

- (1) Whether in November 1995 the Royal Belfast Hospital for Sick Children (RBHSC) had the facilities and resources, both in terms of clinical experience and support services, to carry out paediatric renal transplant surgery, including that with the complexities of Adam's surgery

I believe that the RBHSC did have sufficient experience, infrastructure and case-load to be undertaking paediatric renal transplantation in 1995. This view is based on their average annual transplant rate of **about 7 children**, and their levels of staffing in the departments of paediatric nephrology, transplant surgery and paediatric anaesthesia and PICU. Their primary graft function rate of 48/52 cases indicates a generally successful outcome.

This statement would apply to a child such as Adam. In various places throughout the inquiry discussions, references have been made to Adam's particular surgical complexities. I think this could lead to some inappropriate conclusions in the minds of people who are not familiar with paediatric renal transplantation. As is highlighted in some detail below, although many children that require kidney transplants are less surgically challenging than Adam, his case is in many ways typical of those of many other young children receiving kidneys. The majority of these will be salt-losers, with a relatively high output of weak urine, and many will have had prior surgery upon their ureters and bladders by the time of grafting.

Though some paediatric renal transplant units may consider referring some particularly high-risk cases to a larger centre, this would not apply to children as large as Adam, nor with his spectrum of illness. In my experience, such high-risk children might be very much smaller children (<10 kg), or those with multiple organ disease (eg, with a previous heart transplant, or requiring a combined liver and kidney graft). There would be little point in developing a unit if it could not cope with children such as Adam.

Response This figure was an error on my part, as I misread the period during which they undertook 52 grafts as being from 01/01/1993 to 13/10/2000, instead of to 13/10/2010. The correct figure should therefore have been 3, and not 7 operations per year. However, this does not alter my overall conclusion that it was reasonable at the time for that transplant to be undertaken in Belfast.

The second concerned Dr McGeown's text book. I misunderstood the purpose of the question, and thought it was asking me to evaluate this text as a guide to transplantation now, and indicated that it was no longer in date, so no longer relevant.

Response The question was aimed at asking me to determine how closely the paediatric nephrologists adhered to the text during their management of Adam Strain. I have now read the relevant chapters, and my opinion is that the paediatric nephrologists followed the recommendations in it entirely appropriately.

Report by Dr Coulthard for Adam Strain death inquiry. Signed 

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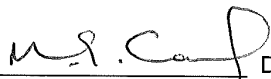
Expert Witness Declaration

I Malcolm Coulthard DECLARE THAT:

- 1) I understand that my duty in providing written reports and giving evidence is to help the Court, and that this duty overrides any obligation to the party by whom I am engaged or the person who has paid or is liable to pay me. I confirm that I have complied and will continue to comply with my duty.
- 2) I confirm that I have not entered into any arrangement where the amount or payment of my fees is in any way dependent on the outcome of the case.
- 3) I know of no conflict of interest of any kind, other than any which I have disclosed in my report.
- 4) I do not consider that any interest which I have disclosed affects my suitability as an expert witness on any issues on which I have given evidence.
- 5) I will advise the party by whom I am instructed if, between the date of my report and the trial, there is any change in circumstances which affect my answers to points 3 and 4 above.
- 6) I have shown the sources of all information I have used.
- 7) I have exercised reasonable care and skill in order to be accurate and complete in preparing this report.
- 8) I have endeavoured to include in my report those matters, of which I have knowledge or of which I have been made aware, that might adversely affect the validity of my opinion. I have clearly stated any qualifications to my opinion.
- 9) I have not, without forming an independent view, included or excluded anything which has been suggested to me by others, including my instructing lawyers.
- 10) I will notify those instructing me immediately and confirm in writing if, for any reason, my existing report requires any correction or qualification.
- 11) I understand that;
 - 11.1) my report will form the evidence to be given under oath or affirmation;
 - 11.2) questions may be put to me in writing for the purposes of clarifying my report and that my answers shall be treated as part of my report and covered by my statement of truth;
 - 11.3) the court may at any stage direct a discussion to take place between experts for the purpose of identifying and discussing the expert issues in the proceedings, where possible reaching an agreed opinion on those issues and identifying what action, if any, may be taken to resolve any of the outstanding issues between the parties;
 - 11.4) the court may direct that following a discussion between the experts that a statement should be prepared showing those issues which are agreed, and those issues which are not agreed, together with a summary of the reasons for disagreeing;
 - 11.5) I may be required to attend court to be cross-examined on my report by a cross-examiner assisted by an expert;
 - 11.6) I am likely to be the subject of public adverse criticism by the judge if the Court concludes that I have not taken reasonable care in trying to meet the standards set out above.
- 12) I have read Part 35 of the Civil Procedure Rules and the accompanying practice direction including the "Protocol for Instruction of Experts to give Evidence in Civil Claims" and I have complied with their requirements.
- 13) I am aware of the practice direction on pre-action conduct. I have acted in accordance with the Code of Practice for Experts.

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.

Signed  Dr Malcolm Coulthard

Dated _____ 01/12/2011

Dr Malcolm Coulthard, BSc, MB BS, DCH, FRCP, FRCPCH, PhD

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