

**NAME OF CHILD:** Adam Strain

**Name:** Jacqueline Cartmill

**Title:** Dr

**Present position and institution:**

**Consultant Obstetrician and Gynaecologist, Altnagelvin Hospital, Glenshane Road, Co. Londonderry (commenced 1<sup>st</sup> October 2008)**

**Previous position and institution:**

*[Since your Witness Statement of 20<sup>th</sup> April 2011]*

**Membership of Advisory Panels and Committees:**

*[Identify by date and title all of those since your Witness Statement of 20<sup>th</sup> April 2011]*

**Previous Statements, Depositions and Reports:**

*[Identify by date and title all those since your Witness Statement of 20<sup>th</sup> April 2011]*

**OFFICIAL USE:**

**List of previous statements, depositions and reports attached:**

| Ref:    | Date:      |                                  |
|---------|------------|----------------------------------|
| 003/1   | 09.10.2005 | Inquiry Witness Statement        |
| 093-008 | 02.05.2006 | PSNI Witness Statement           |
| 003/2   | 20.04.2011 | Second Inquiry Witness Statement |

**IMPORTANT INSTRUCTIONS FOR ANSWERING:**

Please identify clearly any document to which you refer or rely upon for your answer. If the document has an Inquiry reference number, e.g. Ref: 049-001-001 which is 'Chart No.1 Old Notes', then please provide that number. If the document does not have such a number then please provide a copy of the document.

**I QUERIES ARISING OUT OF YOUR SUPPLEMENTAL WITNESS STATEMENT**

With reference to your witness statement dated 20<sup>th</sup> April 2011, please provide clarification and/or further information in respect of the following:

**(1) Answer to Question 1(e) at p.4:**

*"I commenced employment in August 2005; therefore by 26<sup>th</sup> November 1995 I had been working as an SHO in paediatrics for almost 4 months.*

*I do not recall the number of paediatric renal transplant cases I may have been involved with during my 6 months as a paediatric SHO."*

**(a) State whether the date of "August 2005" that you have given for commencing your employment is an error and, if so, please provide the correct date.**

"August 2005" is an error. The correct date is August 1995.

**(b) Your answer is solely in terms of your 6 months as a paediatric SHO. Please state whether or not you had any experience, by 26<sup>th</sup> November 1996 and outside of those 6 months, of assessing the electrolyte results of a child who was being prepared for a renal transplant. If so, please provide the details.**

I assume there is an error with the date provided in this question and that it should be 26<sup>th</sup> November 1995, instead of "26<sup>th</sup> November 1996" as is stated.

I do not recall whether I had any experience by 26<sup>th</sup> November 1995 of assessing the electrolyte results of a child who was being prepared for a renal transplant.

I have no other experience outside of those 6 months of assessing the electrolyte results of a child who was being prepared for a renal transplant.

**(2) Answer to Question 1(f) at p.4:**

*"I do not recall the number of paediatric renal transplant cases I may have been involved with during my 6 months as a paediatric SHO."*

**(a) State whether you were involved in any paediatric renal transplant cases prior to 27<sup>th</sup> November 1995.**

I do not recall whether I was involved in any paediatric transplant cases prior to 27<sup>th</sup> November 1995

**(b) Your answer is solely in terms of your 6 months as a paediatric SHO. Please state whether or not you had any experience, by 26<sup>th</sup> November 1996 and outside of those 6 months, of preparing patients for paediatric renal transplant. If so, please provide the details.**

I assume there is an error with the date provided in this question and that it should be 26<sup>th</sup> November 1995, instead of "26<sup>th</sup> November 1996" as is stated.

I do not recall whether I had any experience by 26<sup>th</sup> November 1995 of preparing patients for paediatric renal transplant.

I have no other experience outside of those 6 months of preparing patients for paediatric renal transplant.

**(3) Answer to Question 1(g) at p.5:**

*"I do not recall the number of paediatric renal transplant cases I may have been involved with during my 6 months as a paediatric SHO."*

**(a) Your answer is solely in terms of your 6 months as a paediatric SHO. Please state whether or not you had any experience, since 26<sup>th</sup> November 1996 and outside of those 6 months, of preparing patients for paediatric renal transplant. If so, please provide the details.**

I assume there is an error with the date provided in this question and that it should be 26<sup>th</sup> November 1995, instead of "26<sup>th</sup> November 1996" as is stated.

I do not recall whether I had any experience since 26<sup>th</sup> November 1995 of preparing patients for paediatric renal transplant.

I have no other experience outside of those 6 months of preparing patients for paediatric renal transplant.

**(4) Answer to Question 2(b) at p.5:**

*"I do not recall a renal transplant protocol that may have governed my actions over the period 26<sup>th</sup> November to 27<sup>th</sup> November."*

**(a) State whether a renal transplant protocol existed prior to Adam's transplant surgery. If so, explain how you learned of it.**

I do not recall whether a renal transplant protocol existed prior to Adam's transplant surgery.

**(b) If a renal transplant protocol did exist prior to Adam's transplant surgery, state whether you were ever provided with a copy of it and if so when.**

I do not recall being provided with a copy of a renal transplant protocol.

**(c) State whether anyone discussed the renal transplant protocol with you in relation to the preparation of Adam for his transplant surgery.**

I do not recall discussing a renal transplant protocol in relation to the preparation of Adam for his transplant surgery

**(5) Answer to Question 2(c) at p.5:**

*"I do not recall and I have not documented any discussions with Dr Savage over the pre-operative fluid management plans for Adam."*

**(a) Describe and explain the discussions that you, as a Senior House Officer in Paediatrics, would have expected to have had prior to Adam's transplant surgery with your Consultant Nephrologist Dr. Savage.**

Although I do not recall and I have not documented any discussions with Dr Savage, I have noted the documentation (ref 058-002-002) that appears to have my name at the top of the page. This document contains pre-transplant instructions that I would have expected and which have been given by Dr Savage. This document states "Adam Strain erect IV give maintenance rate".

**(6) Answer to Question 2(d) at p.6:**

*"I prescribed pre-operative fluids for Adam- 0.18% sodium chloride/4% dextrose to run at a rate of 75mls per hour (ref 057-010-014).*

*There is no signature on the fluid balance chart to indicate that the IV fluids I prescribed were erected. As I recall I finished my SHO on-call shift at 10pm and therefore I was not the Doctor on duty who attended to Adam after issuing of the cannula at 1.30am on 27th November 1995."*

**(a) State who should have signed "the fluid balance chart to indicate that the IV fluids that [you] prescribed had been erected". Please give the reasons for your answer.**

I would have expected the person erecting the IV fluids to sign the fluid balance chart.

I took blood from Adam at 9.30pm for potential renal transplant. I finished my shift at 10pm. It appears the decision to proceed with surgery was made after I had finished work.

The IV fluids would only have been required once the final decision to proceed with Adam's surgery had been made.

**(b) State who should have checked: (i) that the IV fluids had in fact been erected and administered to Adam; and (ii) that the fluid balance chart was signed. Please give the reasons for your answer**

My entry in the notes indicates that Adam attended the ward for possible renal transplant.

The IV fluids would only have been required once the final decision to proceed with Adam's surgery had been made.

I would have expected the IV fluids to be erected and the fluid balance chart to be signed by the staff who were on duty when the final decision was made to proceed with Adam's renal transplant surgery.

(7) Answer to Question 3(a) at p.6:

*"According to my entry in the notes Adam attended the ward for possible renal transplant.*

*According to my entry in the notes (ref 058-035-144) I took blood and prescribed intravenous fluids at 9.30pm on the 26th November 1995.*

*I do not recall the time that the decision to proceed with surgery was finally confirmed.*

*As Dr O'Neill formally admitted ("clerked-in") Adam at 11.30pm on the 26th November 1995 according to the entry in the notes (ref 058-035-131 and 058-035-132). This would appear to indicate that the final decision to proceed with surgery was made at a time between 9.30pm and 11.30pm."*

- (a) You have not adequately answered the question. Please state the time at which you understood "Adam was scheduled to have [his] surgery", whether any changes were made to that start time. If so, please state what those changes were, when they were made, by whom and for what reason.

I have documented that Adam attended the ward at 9.30pm for possible renal transplant. I finished working my shift at 10.00pm.

I do not recall whether a final decision had been made to proceed with Adam's surgery prior to completing my shift.

I do not recall whether there was a start time or whether any changes were made, when they were made, by whom or for what reason.

(8) Answer to Question 3(b) at p.7:

*"I prescribed intravenous fluids taking into account Adam's age, weight and clinical situation."*

- (a) Explain what you mean by "Adam's ... clinical situation".

Adam had an underlying chronic kidney problem and would be required to fast pre-operatively once a final decision had been made to proceed with surgery.

- (b) Explain your reasons for prescribing this type of fluid.

I do not recall the reasons for prescribing this type of fluid on 26<sup>th</sup> November 1995.

- (c) Explain your calculation of the volume and rate of administration of the IV fluids that you prescribed from "Adam's age, weight and clinical situation".

I do not recall how I made this calculation on 26<sup>th</sup> November 1995.

(9) Answer to Question 3(e) at p.7:

*"No start time is recorded on the fluid balance chart (ref 057-010-014)"*

- (a) You have not adequately answered the question. Please state the time you ordered IV fluids to start.

I have not entered a time for IV fluids to start.

The IV fluids would only have been required once the final decision to proceed with Adam's surgery had been made.

I do not recall whether a final decision had been made to proceed with Adam's surgery prior to completing my shift.

- (b) State who should have: (i) inserted the time at which the IV fluids were to start; (ii) checked that the IV fluids started at that time; and (iii) checked that the time was recorded on the fluid balance chart? Give reasons for your answer.

I would have expected the Doctor on duty when the final decision was made to proceed with surgery to have entered a time at which the IV fluids were to start.

I would have expected the person who erected the IV fluids to have checked and recorded the start time.

(10) Answer to Question 3(g) at p.7:

*"Unknown [who was responsible for erecting the IV fluids]"*

- (a) State whether you would expect the person responsible for erecting the IV fluids to be a nurse or a doctor. Give the reasons for your answer.

I would have expected a nurse to erect the IV fluids.

- (b) If you would have expected it to have been a doctor, then state whether it would be you or Dr. O'Neill and give the reasons for your answer.

THIS STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF

Signed: *Jaranelene Oatman*

Dated: *1/8/11*