

Witness Statement Ref. No.

153/1

NAME OF CHILD: Claire Roberts

Name: Sandra Ross

Title: PICU Staff Nurse, RBHSC

Present position and institution: Retired

Previous position and institution: Part-time Staff Nurse, Paediatric Intensive Care Unit, RBHSC
[As at the time of the child's death]

Membership of Advisory Panels and Committees:
[Identify by date and title all of those between January 1995-December 2010]
None

Previous Statements, Depositions and Reports:
[Identify by date and title all those made in relation to the child's death]
None

OFFICIAL USE:
List of previous statements, depositions and reports attached:

Ref:	Date:	

IMPORTANT INSTRUCTIONS FOR ANSWERING:

Please attach additional sheets if more space is required. 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 an Inquiry reference number, then please provide a copy of the document attached to your statement.

- (1) Describe your work commitments to the Royal Belfast Hospital for Sick Children (RBHSC) from the date of your employment there as a nurse, including the department/s and locations in which you worked and the periods of time in each department/location, and in particular with regard to the period 21st October 1996 to 23rd October 1996.**

I trained as a nurse in the Royal Belfast Hospital for Sick Children (RBHSC) from April 1965 until May 1968 when I qualified as a Registered Sick Childrens Nurse (R.S.C.N).

I worked as a part-time staff nurse on night duty from September 1968 until November 1973 working in the Paediatric Intensive Care Unit (PICU).

I returned around 1975 working as a part-time staff nurse until approximately 1979 working in the PICU or as a general runner for the hospital.

I recommenced working 22hrs each week on night duty in PICU from 1980 until my retirement in 2007. This would include the period 21st October to 23rd October.

I worked as part of the multidisciplinary team, responsible to ward sister.

Responsibility to patients in implementing and following care plan guidelines.

Communicating with colleagues and carrying out instructions from medical staff.

- (2) State the times at which you were on duty between 21st October 1996 to 23rd October 1996 and in particular:**

- (a) Whether you were on duty and present in the hospital at all times or**

Ref No 090-027-082. From these notes it would seem that I was on duty from 22nd October at 8pm until 8am on 23rd October 1996. I do not remember being on duty at this time.

- (b) Whether you were on call during that period**

I never did on-call duties.

- (c) What contact you had with Claire and her family during that period including where and when that contact occurred**

Ref No 090-027-086. Identifying my writing on these notes I admitted Claire to PICU at 3am. I do not remember this.

Claire also went for a CT Scan. I cannot remember if I accompanied her.

Ref No 090-028-088. I have identified this as my writing. If I accompanied the doctors when they spoke to Claire's parents following her CT Scan, I do not remember.

I do not remember any other contact with parents.

(3) Describe what you considered to be your role in relation to, and responsibilities towards, Claire and her family over the period from her attending A&E in RBHSC on 21st October 1996 until 23rd October 1996 when ventilatory support was withdrawn, and in particular:

(a) From Claire's attendance at A&E at RBHSC until her arrival in Allen Ward

I never worked in the Accident & Emergency Department.

(b) While Claire was in Allen Ward until her admission to PICU

I never worked in Allen Ward.

(c) From admission to PICU until her death

My role and responsibilities towards Claire would have been to carry out all nursing care.

- i) Recording observations, heart rate, blood pressure, temperature. Central Nervous System observations (CNS), oxygen saturation. Ventilatory settings.
- ii) Personal care. Eyes, mouth and skin, position.
- iii) Administering any fluids or drugs as prescribed by doctors.
- iv) Updating parents on Claire's condition.

I do not remember nursing Claire.

(4) Describe your role, responsibilities and actions in relation to:

(a) Claire's fluid administration, monitoring and management

My role and responsibilities to Claire's fluid administration and management would have been:

- i) Administering any fluids as prescribed by medical staff.
- ii) Monitoring intake and output hourly and recording same on fluid balance chart.
- iii) Protecting and observing all intravenous sites.

- iv) Reporting any changes to medical staff and implementing any changes they ordered.

As to my specific actions on 23rd October 1996 I can not remember.

- (b) The making and recording of observations of Claire including determining the type of and reviewing the frequency of those observations

Initiating and implementing care plan would involve the recording of observations.

- i) Monitoring ventilation
- ii) Making sure airway was secure and patent by frequent suctioning of the endotracheal tube.
- iii) Recording heart rate, oxygen saturations. These observations are usually recorded hourly but sometimes more frequently depending on condition of the patient. Reporting any changes to medical staff. The role and responsibilities and actions relate to any patient being admittd to PICU.

I do not remember nursing Claire.

- (5) In relation to the actions which you have described above in respect of Claire's fluid management etc. and the making of observations etc.:

- (a) Explain the reasons for your actions

I cannot comment as PICU observation and fluid balance charts are unavailable. I do not remember any actions taken.

- (b) State which of them you carried out on the express instructions of a doctor, identifying in each case:

- (i) the doctor concerned

I do not remember which doctor was on duty.

- (ii) the instructions they gave you

I do not remember any instructions received.

- (iii) when they gave them to you

I do not remember when they gave them to me.

- (c) Whether you sought advice from or consulted with any other doctors or nurses prior to taking any of those actions, and if so:

- (i) identify the persons from whom you sought advice/consulted and state when you did so

- (ii) state the nature of the advice you sought/the issues on which you consulted
- (iii) state the advice that you received and identify the person who gave it to you
- (iv) if you did not seek any such advice or consultation, explain why not

(6) Describe and explain any discussions you had with any doctors and/or nursing staff in relation to Claire whilst you were on duty following her admission to PICU on 23rd October 1996, including:

(a) The identity of the person concerned

Ref no 090-027-082. I have identified Staff Nurse Wilkin as taking over Claire's care from me at 8am on 23rd October 1996. I would have given her a verbal report but I do not remember this.

(b) Where and when the discussions took place

These discussions would have been at the bedside but I do not remember.

(c) What prompted the discussions

This would have been the practice of handing nursing details over to whoever was allocated to the patient.

I do not remember any specific discussions with doctors.

(7) State whether you reported Claire's condition, including her blood results, to a doctor(s) at any time following her admission to PICU on 23rd October 1996, and if so:

(a) Identify the doctor(s) to whom you reported and state the time at which you reported

I do not remember which doctors were on duty on 23rd October 1996.

(b) State the means by which you conveyed that report e.g. orally, in person, by telephone, in writing

I do not remember giving any information.

(c) Describe and explain what you reported

I do not remember reporting any results.

(d) State whether, as a result of your report, Claire:

(i) was reviewed or reassessed, and if so explain the result of any such review/assessment

I do not remember.

- (ii) had her care/treatment changed, and if so describe any changes that were made and explain the reason for them

I do not remember.

- (e) If Claire was not reviewed/reassessed or did not have her care/treatment changed, then please give the reasons
- (8) Identify precisely on Claire's medical notes and records the entries that you made or which were made on your direction and state below:
- (a) when each of the identified entries was made
- (b) the source of the information recorded in the entry

My handwriting is on 090-027-080. And 081.

The first two lines on 090-027- 082 are my handwriting. The first line on b is my handwriting and the first line on d.

090-027-086 is my handwriting and 090-027-088 is my handwriting on the explanation part of the relative counseling record.

- (9) State whether you checked what was written in the medical notes about Claire at any time, and if so, state when and why you did so. If you did not do so, state the reasons why not.

I do not remember reading Claire's medical notes.

- (10) Explain the policy and procedure at the RBHSC in October 1996 for nurses contacting a registrar on the appropriate clinical team directly, if they were unhappy with the SHO's/junior doctor's response.

I cannot remember any policy or procedures in October 1996 for nurses contacting the medical staff.

- (11) Explain the policy and procedure at the RBHSC in October 1996 for nurses contacting the on call consultant responsible for the patient directly, if they were unhappy with the responses of SHO/Registrar.

I do not remember if there was a policy or procedure for contacting the consultant in 1996.

- (12) State whether you were present at any time while Claire was being examined by a doctor, and if so, identify the doctor conducting the examination, and state when this occurred and what you were informed about Claire's diagnosis, condition and management at that time.

I cannot remember if I was present while Claire was being examined, who carried out the examination or what information was given.

- (13) State when you were on duty in PICU on 23rd October 1996:-

- (a) State whether you were involved in transferring Claire from Allen Ward to PICU on 23rd October 1996 and identify all nurses and other clinicians by name and position who were involved in this transfer. If so, describe the nature of your involvement or the involvement of the other clinicians or nurses in that transfer.

Ref No 090-027-086. From notes I was on duty on 23rd October 1996 but I do not remember any details of Claire's transfer from Allen Ward to PICU.

- (b) Identify the consultant/s and any other clinicians who accompanied Claire when she was transferred from Allen Ward to PICU.

I do not remember which doctors were on duty on 23rd October 1996.

- (c) Identify any nurses who accompanied Claire when she was transferred from Allen Ward to PICU.

I do not remember any nursing staff who accompanied Claire to PICU from Allen Ward.

- (d) Identify the consultant or other clinician in PICU to whom Claire's care was transferred on 23rd October 1996.

I do not remember which consultant or clinician was on duty on 23rd October 1996.

- (e) Identify the designated PICU nurse and any other PICU nurse/runner to whom Claire's care was transferred on 23rd October 1996.

Ref No 090-027-086. According to these notes I was the designated nurse who admitted Claire to PICU. I do not remember any other members of staff who were on duty on 23rd October 1996.

- (f) State at what time Claire's handover to PICU clinicians took place on 23rd October 1996 and identify who was present during that handover.

I do not know what time the handover to PICU clinicians took place or who was present at that time.

- (g) Identify who carried out the handover to the PICU clinician/s on Claire's arrival in PICU on 23rd October 1996, and state what information was given to the PICU clinician/s, or if you do not recall specifically, what information was likely/normally given during that handover, about:

I cannot identify who carried out the handover to PICU clinicians when Claire arrived in PICU or what information was given.

Normally I would not be involved in clinicians handover, only nursing handover. Remainder of question not relevant to my duties as a staff nurse.

- (i) Claire
- (ii) the reason for Claire's transfer to PICU

- (iii) Claire's diagnoses since her admission to RBHSC and on transfer to PICU
- (iv) the cause of Claire's respiratory arrest and fixed and dilated pupils
- (v) Claire's serum sodium concentration since her admission and in particular the serum sodium concentration of 121mmol/L recorded at 23.30 in Claire's medical notes on 22nd October 1996 (Ref: 090-022-056), and the cause of these sodium concentration levels
- (vi) the cause of Claire's cerebral oedema
- (vii) the likelihood that Claire had SIADH and the possible causes of this syndrome
- (viii) Claire's fluid input and output since her admission
- (ix) Claire's presentation, attacks and central nervous observations since her admission
- (h) State at what time Claire's handover to PICU nurses took place on 23rd October 1996 and identify who was present during that handover.

Ref No 090-027-086. This is my handwriting stating that Claire was admitted at 3am on 23rd October 1996. I do not remember who was present during that handover.

- (i) Identify who carried out the handover to the PICU nurse/s on Claire's arrival in PICU on 23rd October 1996, and state what information was given to the PICU nurse/s, or if you do not recall specifically what information was likely/normally given during that handover, about:

I do not remember who gave handover or what specifically information given. Normally given short history on background of patient and what had occurred since admission to ward.

- (i) Claire
- (ii) the reason for Claire's transfer to PICU
- (iii) Claire's diagnoses since her admission to RBHSC and on transfer to PICU
- (iv) the cause of Claire's respiratory arrest and fixed and dilated pupils
- (v) Claire's serum sodium concentration since her admission, and in particular the serum sodium concentration of 121mmol/L recorded at 23.30 in Claire's medical notes on 22nd October 1996 (Ref: 090-022-056), and the cause of these sodium concentration levels
- (vi) the cause of Claire's cerebral oedema
- (vii) the likelihood that Claire had SIADH and the possible causes of this syndrome
- (viii) Claire's fluid input and output since her admission

(ix) Claire's presentation, attacks and central nervous observations since her admission

(i) - (ix) I do not remember any of these details.

- (j) Identify any protocols, guidance, procedure and accepted practice in October 1996 relating to the transfer to PICU and the handover to PICU staff, and please furnish copies thereof.

I do not remember if there were any written protocols or guidance on the transfer and handover of patients to PICU in October 1996.

- (k) Identify the consultant you believed at that time to be responsible for Claire when she was admitted to PICU on 23rd October 1996, and the basis for your belief.

I do not remember which Consultant was on call on 23rd October 1996.

- (14) State whether you made any entries on the Paediatric Intensive Care Unit form (Ref: 090-027-078 and 090-027-079), and if so, specify which entries you made or were made on your direction, and state when you completed the same.

Ref No 090-027-078 and 090-027-079. I do not identify my writing on these forms.

- (a) If you completed these details, please state why your signature does not appear on Ref: 090-027-079.

I did not make any entries on these forms.

- (b) State the source of information of the details completed under "*Reason for Admission: Respiratory Arrest*" (Ref: 090-027-078).

I did not make any entries on these forms.

- (c) State your understanding at that time of the cause of the respiratory arrest and the basis of that understanding.

I did not make any entries on these forms.

- (d) Identify the "*Nurse*" and "*Doctor*" who are recorded as accompanying Claire to PICU (Ref: 090-027-078).

I did not make any entries on these forms.

- (e) State the source of information of the details "*Why do the parents think the child has been admitted: Due to respiratory arrest and needing further care.*" (Ref: 090-027-078).

I did not make any entries on these forms.

- (f) State the source of information of the details recorded "*Medical Diagnosis: ? Viral*" (Ref: 090-027-078).

I did not make any entries on these forms.

- (g) State the source of information of the details recorded "*Consultants: Dr. Steen*" and the basis upon which that information was recorded. (Ref: 090-027-078).

I did not make any entries on these forms.

- (h) State the source of the information recorded under "*previous relevant history/admissions*". (Ref: 090-027-078).

I did not make any entries on these forms.

- (i) State whether you were aware on Claire's admission to PICU or at any time thereafter on 23rd October 1996 of Claire's serum sodium results of 121mmol/L recorded at 23.30 on 22nd October 1996 (Ref: 090-022-056) and at approximately 03.00 on 23rd October 1996 (Ref: 090-022-057) in her medical notes, and if so state the source of your knowledge and when you became aware of these results. If you were not aware of these results, explain the reasons why not.

I do not remember any details about sodium results.

- (j) State your knowledge on Claire's admission to PICU or at any time thereafter on 23rd October 1996 of the relevance of those serum sodium results to Claire's condition, and the source of that knowledge. If you did not have knowledge of these serum sodium results at that time, explain why not.

I do not remember any details about Claire's admission to PICU.

- (k) Explain the reasons why Claire's serum sodium results are not recorded in the PICU nursing forms (Ref: 090-027-078 to 090-027-088) on her admission to PICU or at any time thereafter.

My writing identified on 090-027-080. I do not remember why Claire's sodium results are not recorded on nursing forms.

- (l) Explain the reasons why there is no reference to hyponatraemia on Claire's PICU nursing forms (Ref: 090-027-078 to 090-027-088).

I do not remember why there is no reference to Hyponatraemia on the PICU nursing forms.

- (15) State whether you made any entries on the Paediatric Intensive Care Unit Patient Assessment form (Ref: 090-027-080 to 090-027-087), and if so, specify which entries you made or were made on your direction, and state when you completed same and the basis upon which you made each entry:

The entries on form 090-027-080 and 081. The first lines on 090-027-082, 090-027-086 and 090-027-088. I have identified these as my writing.

- (a) State whether the date and time of "22/10/96 7am" (Ref: 090-027-080) should refer to 23/10/96, and also whether the time is correct.

I would agree that this date is wrong and should refer to 23rd October 1996. I do not remember if the time is exact.

- (b) Identify the person who measured Claire's weight which is noted as "25kgs" and state the means by which and where this was measured. (Ref: 090-027-080).

I have recorded Claire's weight as 25kgs but I do not remember where this was obtained from.

- (c) With reference to assessment of Claire's Glasgow Coma Scale (GCS) as 3, state the time at which this assessment was made, and how you derived the score of 3 (Ref: 090-027-080).

I do not remember the time this assessment was made. Glasgow Coma Scale of 3 would have been recorded from Central Nervous System observations on Glasgow Coma Scale Chart. Glasgow Coma Scale chart for PICU not available.

- (d) On admission, "Cardiac rat" was assessed as "normal" and the heart rate was recorded as 140. (Ref: 090-027-080) Please state your understanding of the normal heart rate range for a 9-year-old child.

I do not remember why I recorded heart rate of 140 as normal in a 9 year old child. Normal heart rate would be anything from 70 - 120. Observation charts for PICU not available.

- (e) Explain the entries made under the section entitled "Nutrition/Hydration" (Ref: 090-027-081) on Claire's Patient Assessment Form. Why does this not include information about the fluids/infusions in progress on admission?

I do not remember why fluids in situ are not written on patient assessment form.

- (f) State what information you were given in relation to: (i) Claire's state of hydration and (ii) Claire's U&E levels and (iii) Claire's serum sodium level when she was admitted to PICU, and identify the person who gave you that information. (Ref: 090-027-081)

I do not remember any information given to me when Claire was admitted to PICU.

- (g) State the time at which a naso-gastric tube was inserted (Ref: 090-027-081).

I do not remember at what time the naso-gastric tube was inserted.

- (h) State the time at which a urinary catheter was inserted and state whether the reference to "22/10/96" (Ref: 090-027-081) should refer to 23/10/96.

22/10/96 should be 23/10/96.

- (i) State what you mean by the entry: "*Skin intact - No*" (Ref: 090-027-081). Which areas of Claire's skin were not intact?

I cannot remember specifically which areas of skin not intact. Possibly where intravenous lines were inserted.

- (j) State why "*epileptic*" is recorded under "*psychological/social/cultural*" (Ref: 090-027-081) and the source of this information. Please explain your understanding at the time of Claire's history of seizures and the basis upon which Claire is described as "*epileptic*" in this document.

As a nurse I didn't diagnose medical conditions so the reference to epilepsy would have been information given to me either verbally or from the medical notes. I do not remember.

- (16) "*Date: 22/10/96*"

Summary: 9 1/2 yr old girl with learning difficulties and Epileptic admitted to Allen wd 32 hrs ago with ↓ level of consciousness due to ? aetiology. Had sudden respiratory arrest at 3am 22/10/96. CT scan showed severe swelling." (Ref: 090-027-082).

- (a) State whether the reference to "*22/10/96*" should be *23/10/96*.

I would have commenced duty at 8pm on 22nd October 1996 so Claire's admission at 3am would be 23rd October 1996.

- (b) State the time at which this entry was made.

I do not remember at which time this entry was made.

- (c) State whether a child with a past history of seizures, who was fit free for 3 years and off anti-convulsants for 18 months, who had a questionable seizure the day of admission, could accurately be described as epileptic, and state the reasons why.

I cannot comment on this. This is a medical question.

- (d) Explain in detail the basis upon which you describe Claire as "*Epileptic*" and the source of the information recorded.

I do not remember where this information was obtained from.

- (e) State the meaning of "*with ↓ level of consciousness due to ? aetiology*" and the source of the information recorded.

I do not remember where this information came from.

- (f) State your understanding at that time of the cause of the respiratory arrest and the basis of that understanding.

I do not remember if any details given about the cause of respiratory arrest.

- (g) Explain what was swollen in relation to: "CT scan showed severe swelling".

Ref No 090-028-088. CT Scan showed severe swelling of brain tissue.

- (h) State your knowledge at the time this entry was made of Claire's serum sodium level.

I do not remember any knowledge of Claire's sodium level.

- (i) Explain the reasons why no reference is made to Claire's serum sodium results and/or hyponatraemia in this summary.

I do not remember why there is no reference to Claire's sodium results in summary.

(17) "Assessment of Condition/Needs...

...(B) Cardiovascular: Hypotension. Dopamine infusion running. Temperature low." (Ref: 090-027-082)

- (a) Please clarify the entries made in this section and explain their significance.

090-027-082. Observations chart would have shown blood pressure was low (hypotension). Doctors would have prescribed dopamine infusion to maintain pressure \uparrow 100. As a nurse I would not have prescribed this treatment.

(18) "(D) Neurology: GCS 3" (Ref: 090-027-082)

- (a) State the time at which this assessment was made and the basis upon which this score was calculated.

Ref No 090-027-082. GCS 3. I do not remember at what time this assessment was carried out. The score would be calculated on observations recorded on Glasgow Coma Scale Chart. Same not available.

(19) "(E) Nutrition/Hydration: Nil orally. N/... Saline running IV 32mls hrly. KCL infusion running 4 mls hrly.

Goals and Planned Care...

To maintain U-E within normal limits. Record intakes hrly." (Ref: 090-027-083)

- (a) State the time at which this entry was made.
- (b) Specify the type of saline recorded as "running IV 32 mls/hrly."
- (c) State your knowledge at the time this entry was made of Claire's serum sodium level.
- (d) Explain the reasons why no reference is made to Claire's serum sodium results and/or hyponatraemia in this part of the form dealing with "Hydration."

I cannot comment on this sections of the form (a-d) as not relevant to me.

(20) *"(G) Hygiene/Mobility/Wound Care: Skin intact"* (Ref: 090-027-083)

This is not my writing (090-027-083).

(a) Please clarify *"skin intact"* in view of the entry *"Skin intact - No"* at Ref: 090-027-081.

(21) *"23/10/96"*

Morning 8am-2pm... Evening: 2pm-6.15pm.

(E) I.V. fluids as per chart. (E) IV Fluids changed to 5/N Saline"

(Ref: 090-027-084).

(a) Please identify the PICU Fluid Balance and IV prescription sheet and furnish a copy thereof.

I was not on duty at this time.

(b) State whether the records state that *"IV Fluids changed to"* 5/N Saline or S/N Saline.

I was not on duty at this time.

(c) State the reasons why the IV fluids were changed in this way at that time and identify the person/s who decided to change the fluids.

I was not on duty at this time.

(22) *"Dr. Webb/Dr. Steen have discussed Claire's clinical condition with her parents."* (Ref: 090-022-060)

"Relative Counselling Record"

Evaluation

Explained to [Claire's] parents that Claire's brain had swollen... Parents...Asked why her brain had swollen. It was explained it was probably caused by a virus." (Ref: 090-028-088)

Ref No 090-022-060 - not applicable to me. Ref No 090-028-088. I have identified my writing on the explanation section of the relative counselling record.

(a) State whether you were present on any occasions when Dr. Webb and/or Dr Steen *"discussed Claire's clinical condition with her parents"* on 23rd October 1996.

I do not remember if I was present when Dr Webb/Dr Steen discussed Claire's clinical condition with her parents.

- (b) In relation to each occasion: state when and where these discussions occurred, who was present and set out in detail exactly what Mr. and Mrs. Roberts were told and furnish copies of all minutes and records thereof.

I do not remember when or where these discussions took place or who was present at this time. I have recorded information given under explanations column but don't remember where information was obtained.

- (c) Explain the basis and reasons for Dr. Webb and/or Dr. Steen explaining to Mr and Mrs. Roberts that Claire's cerebral oedema "*was probably caused by a virus*", and not discussing any other possible or likely cause.

I was not present at this discussion as this is not my writing stating the comment (was probably caused by a virus).

- (d) Specify in particular what Claire's parents were expressly informed in relation to:

- (i) Claire's low serum sodium concentration results and the cause thereof

I do not know.

- (ii) Claire's hyponatraemia and the cause thereof

I do not know.

- (iii) Whether the serum sodium concentration or hyponatraemia caused or contributed to the cerebral oedema and/or Claire's death

I do not know.

- (iv) Claire's cerebral oedema and the cause thereof

I do not know the answer to this question.

- (v) Your diagnosis of Claire's condition including any reference to non-convulsive status epilepticus, encephalitis, encephalopathy

I do not know the answer to this question.

- (vi) Claire's Glasgow Coma Scale and/or deteriorating level of consciousness

I do not know the answer to this question.

- (vii) Claire's fluid regime and management

I do not know the answer to this question.

and the reasons for giving this information to her parents. If some of the information was not given to Claire's parents, explain why not.

- (e) If Mr. and Mrs. Roberts were not informed of any of the matters above, state the reasons for this.

I cannot remember.

- (f) State the reasons why Mr. and Mrs. Roberts were not informed that hyponatraemia or falling sodium levels caused or contributed to the cerebral oedema and Claire's death at any time prior to 7th December 2004.

I do not know the answer to this question.

- (23) State whether you were present during any discussions between clinicians and Mr and Mrs. Roberts in relation to Claire's cause of death and if so, state:

- (a) when and where those discussions occurred.
- (b) who else was present.
- (c) the details of what was discussed.
- (d) what information was given to Mr. and Mrs. Roberts about the role of status epilepticus in the deterioration and death of Claire. If no information was given about this, explain why not.
- (e) what information was given to Mr. and Mrs. Roberts about the role of hyponatraemia in the deterioration and death of Claire. If no information was given about this, explain why not.
- (f) where the information given to Mr and Mrs. Roberts was recorded and furnish a copy thereof.

a-f - I was not on duty at this time.

- (24) "Evening 2pm-6.15pm.

Death certificate issued.

For PM in am. Consent signed" (Ref: 090-027-085)

- (a) Identify the person/s who issued the death certificate on 23rd October 1996 and the causes of death recorded in the death certificate.
- (b) Describe the "consent" which was "signed", identify the person/s who signed it and state to what the signatories were consenting.
- (c) Identify the person/s who decided that there would be a brain only post mortem, and the reasons for restricting the post mortem to brain only in Claire's case.

a-c - I was not on duty at this time.

(25) "Night: 22/10/96

*Admitted from Allen wd at 3am following respiratory arrest. Intubated and ventilated. Went to CT scan which showed diffuse swelling. Brain stem tests x 1 positive. ? for organ donation."
Signature: S. Ross" (Ref: 090-027-086)*

(a) State the basis of the information which you recorded on the form.

I cannot remember where I obtained this information.

(b) State at what time you completed this form.

I do not remember at what time this form was completed.

(c) State your understanding at that time of the cause of the respiratory arrest and the source of that understanding.

I do not know the cause of Claire's respiratory arrest at that time or where information was obtained from.

(d) State whether the date is correct or whether it should refer to 23/10/96.

The date should refer to 23/10/96.

(26) Identify any entries you made on the Relative Counselling Record (Ref: 090-028-088), and if so state when you made each entry and the basis for this entry.

I have identified my writing on the explanation column of the relative counselling sheet.

(a) State whether you were present at each meeting recorded on that relative counselling record between Dr. Steen, Dr. Webb and Mr and Mrs. Roberts.

I do not remember if I was present at each meeting between Drs Steen, Dr Webb and Claire's parents.

(b) Identify any other persons who were present at those meetings.

I do not remember who was present at these meetings.

(c) State whether Dr. Steen or Dr. Webb made any reference during either of those meetings to Claire's serum sodium level, and if so, describe exactly what they said.

I do not remember anything that was said.

(d) State whether Dr. Steen or Dr. Webb made any reference during either of those meetings to hyponatraemia, and if so, describe exactly what they said.

I do not remember what was said.

- (e) State whether Dr. Steen or Dr. Webb made any reference during either of those meetings to SIADH, and if so, describe exactly what they said.

I do not remember what was said.

- (27) State what type of nursing operated in PICU on 23rd October 1996, i.e. named nursing, patient allocation nursing or team nursing.

On this date I cannot specifically recall what type of nursing operating in PICU but I think it was patient allocated nursing.

- (a) State whether on 23rd October 1996, the nursing care and management of Claire was allocated to a particular nurse, or to a nursing team.

Ref No 090-027-080. I do not remember nursing Claire but from reference I was the nurse who admitted her to PICU.

- (b) If there was patient allocation nursing, identify the allocated nurse.

If there was allocating nursing at that time I would have been the allocated nurse, as I am identified as her admitting nurse from 3am until 8am. S/N Wilkin is identified as her allocated nurse from 8am on 23/10/96.

- (c) If there was team nursing, state the reasons why Claire's care was not allocated to a particular nurse.

In an emergency admission to PICU the allocated nurse would also be assisted by other members of nursing staff as needed.

- (28) Identify the members of the PICU team on duty when Claire was admitted to PICU on 23rd October 1996, and their respective job titles.

I do not remember which members of the PICU team were on duty on 23rd October 1996.

- (29) Describe any changes to the members of that PICU team during your care of Claire, the time when each change occurred and identify the additional/new members of the team and their respective job titles.

Ref no 090-027-082. From these nursing notes S/N Wilkin took over Claire's care from me at 8am on 23rd October 1996. I do not remember any other members of team who were on duty, doctors or nurses.

- (30) Identify the members of the nursing team on duty on 23rd October 1996 when Claire was admitted to PICU and their respective job titles.

I have identified that I was on duty on 23/10/96 when Claire was admitted to PICU but do not remember any other members of staff who were on duty.

(31) Describe any changes to the members of that nursing team during your care of Claire, the time when each change occurred and identify the additional/new members of the team and their respective job titles.

I do not remember any members of nursing team on duty on 23/10/96.

(32) In October 1996, state whether nursing care was prescribed by doctors, nurses or both.

In October 1996 I think that both nurses and doctors would have input into nursing care of patient.

(33) State what communication you had with Dr. Heather Steen in relation to Claire after her admission on 23rd October 1996 including:

I do not remember what communication I had with Dr Heather Steen in relation to Claire after her admission on 23rd October 1996 to PICU.

- (a) The date and time each communication was made, and the means by which communication was made e.g. in writing, telephone, in person etc.
- (b) Identify who initiated each communication and the reason for each communication being made
- (c) State what information you gave Dr. Heather Steen about Claire during each communication
- (d) State what advice or instructions Dr. Heather Steen gave you in relation to Claire on each occasion and what the plan of care was for Claire following each communication
- (e) Identify any document where each communication is recorded and produce a copy thereof.
- (f) If no communication was made, explain why not
- (g) State whether Dr. Steen attended and examined Claire at any time between Claire's attendance at A&E on 21st October 1996 and Claire's death on 23rd October 1996, and if so, state the date, time and location of that attendance and examination

a-g - I do not remember any communication, information or instructions given at this time.

(34) State what communication you had with Dr. David Webb in relation to Claire after her admission to PICU on 23rd October 1996 including:

I do not remember any communication with Dr David Webb in relation to Claire after her admission to PICU on 23rd October 1996.

- (a) The date and time each communication was made, and the means by which communication was made e.g. in writing, telephone, in person etc.

- (b) Identify who initiated each communication and the reason for each communication being made .
- (c) State what information you gave Dr. David Webb about Claire during each communication
- (d) State what advice or instructions Dr. David Webb gave you in relation to Claire on each occasion and what the plan of care was for Claire following each communication
- (e) Identify any document where each communication is recorded and produce a copy thereof
- (f) If no communication was made, explain why not
- (g) Identify any protocols/guidelines from 22nd October 1996 to date governing the request for and provision of a specialist opinion by another consultant, and the transfer of care and management of a child to another consultant, and furnish copies thereof

a-g - I do not remember any communication, information or instructions given at this time.

- (35) Explain the nature and status of the document entitled 'Discharge/Transfer Advice Note' at Ref: 090-007-009, identify who completed that document and state when and where it was completed.

Ref No 090-007-009 not relevant to me.

- (36) State whether you are a member of the RCN or a union, and if so, state whether you have communicated with that organisation in relation to the treatment and death of Claire, and if so, state when you communicated with it.

I do not see the relevance of this question to the Inquiry.

- (37) Describe your perception of the seriousness or otherwise of Claire's condition during your care of her, and give the reasons for your view.

Any child admitted to PICU and especially following a respiratory arrest is seriously ill.

- (38) Describe your communication with Claire's parents and family and in particular:
 - (a) State what information you communicated to Claire's parents and family, and what information they gave to you
 - (b) Identify to whom you passed on the information that you received
 - (c) State when and where you told them this information
 - (d) Identify where the information you communicated/received is recorded or noted

- (e) State whether you recorded Claire's parents'/family's understanding of the information that you gave them and their concerns
- (f) If you did record the information and their concerns, identify the documents containing that record. If you did not record it, explain why not
- (g) State whether you informed Claire's parents/family of the diagnosis, its implications and the treatment needed, and if so, state when you provided this information, to whom and where this communication is recorded. If you did not provide this information, explain why not. If any such communication is not recorded, explain why not

a-g I do not remember if I had any communication with Claire's parents.

(39) Describe, in detail, any audit and learning that you were involved in relating to the death of Claire:

- (a) With nursing colleagues
- (b) Within the department
- (c) As an individual

I do not remember any audit or learning in relation to the death of Claire.

(40) Prior to 23rd October 1996:

- (a) State your knowledge and awareness of the case of Adam Strain, his Inquest and the issues arising from it
- (b) State the source of your knowledge and awareness and when you acquired it
- (c) Describe how that knowledge and awareness affected your care and treatment of Claire

I do not remember if I was aware of the case of Adam Strain prior to 23rd October 1996.

(41) Since 23rd October 1996:

- (a) State your knowledge and awareness of the case of Adam Strain, his Inquest and the issues arising from it
- (b) State the source of your knowledge and awareness and when you acquired it
- (c) Describe how that knowledge and awareness affected your work

Aware of the case of Adam Strain since 23rd October 1996 but I do not remember any specific details.

(42) Describe in detail the education and training you received in relation to:

- (a) Fluid management and balance (in particular hyponatraemia)

- (b) Record keeping
- (c) Assessment of children with reduced level of consciousness (e.g. Glasgow Coma Scale)
- (d) Assessment of children with a learning disability
- (e) Assessment of children with diarrhoea and vomiting
- (f) Communication with parents of sick children
- (g) Resuscitation in children
- (h) Recognition of the deteriorating child

through the following, providing dates and names of the institutions/bodies:

- (i) Undergraduate level
- (ii) Postgraduate level
- (iii) Hospital induction programmes
- (iv) Continuous professional development

I cannot recall specific details of my education and training with regard to this list (a-h). I do recall that annual CPR training was received. Completed PICU course in 2000 (i - iv).

(43) Prior to 21st October 1996, describe in detail your experience of dealing with children with hyponatraemia, including the:

- (a) Estimated total number of such cases, together with the dates and where they took place
- (b) Number of the children who were aged less than 10 years old
- (c) Nature of your involvement
- (d) Outcome for the children

Prior to 21st October 1996 I cannot remember any details of experience in dealing with children with hyponatraemia.

(44) Since 21st October 1996, describe in detail your experience of dealing with children with hyponatraemia, including the:

- (a) Estimated total number of such cases, together with the dates and where they took place
- (b) Number of the children who were aged less than 10 years old
- (c) Nature of your involvement

(d) Outcome for the children

Since 21st October 1996 I cannot remember any details of experience in dealing with children with hyponatraemia.

(45) Identify any 'Protocols' and/or 'Guidelines' which governed Claire's care and treatment.

I do not remember any protocols and/or guidelines which governed Claire's care and treatment.

(46) Provide any further points and comments that you wish to make, together with any documents, in relation to:

- (a) The care and treatment of Claire from her attendance on 21st October 1996 to her death on 23rd October 1996**
- (b) Record keeping**
- (c) Communications with Claire's family about her condition, diagnosis, and care and treatment**
- (d) Lessons learned from Claire's death and how that has affected your practice**
- (e) Current Protocols and procedures**
- (f) Any other relevant matter**

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

Signed: *Sandra Ross R.S.C.N.*

Dated: *06-01-12*