

Witness Statement Ref. No.

154/1

NAME OF CHILD: Claire Roberts

Name: Margaret Wilkin

Title: PICU Staff Nurse, RBHSC

Present position and institution:

Retired

Previous position and institution:

[As at the time of the child's death]

Staff nurse (part time), Royal Belfast Hospital for sick children. Paediatric Intensive Care.

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:

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.**

Part time staff nurse since 1987 in paediatric intensive care unit (PICU) (RBHSC):

- Responsible to ward sister.
- Make sure patient care plan adhered to
- Communicate with doctors and nursing staff

I was working in PICU on 23rd October 1996. According to patient notes, I was on duty from 7.45 am until 8.00 pm. However I have no memory of the day.

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

Reference number: 090-027-084

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

According to patient notes, I was on duty from 7.45 am until 8.00 pm.

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

No.

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

Ref: 090-027-084/085. According to the notes I was Claire's allocated nurse from 7.45am until 6.15pm (time of death). I do not recall any contact or conversations with Claire's 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 A&E.

(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 was:

- to make Claire as comfortable as possible
 - carry out all treatment ordered by doctors
 - reassure her parents and keep them informed of all stages of Claire's treatment
- These would have been my responsibilities for any child in PICU but I do not remember nursing Claire.

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

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

Role:

- To administrate fluids as prescribed by medical staff
- Hourly fluid balance
- Assess the intake and output on a regular basis

Actions: ref 090-027-084

As recorded in nursing notes

- Changed IV fluids as prescribed by doctor
 - 200 mls human plasma protein fraction (HPPF) was given followed by 600 mls as prescribed by doctor.
 - 150 mls HPPF were given as prescribed by doctor.
 - Desmopression (DDAVP) infusion commenced as prescribed by doctor.
- No more detail available as fluid balance charts for PICU are missing.

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

Role:

- Hourly observations of heart beat, blood pressure, temperature, oxygen saturations, central nervous system and ventilator settings.
 - Observe any changes in Claire's condition and report the same.
- Sometimes observations would have been done more frequently depending on condition of patient.

Actions: ref 090-027-084

As recorded on nursing notes

- I noted a low temperature and nursed on heating blanket.

- I noted a low blood pressure and gave HPPF as prescribed by doctor.
No more detail available as observation charts for PICU are missing.

(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

Ref: 090-027-084.

As recorded on nursing notes

- 200 mls human plasma protein fraction (HPPF) was given followed by 600 mls. Blood pressure fallen again at 2pm. 150 mls HPPF were given. These actions were taken because blood pressure had fallen.
- DDAVP infusion commenced because of urine excess.
- Nursed on heat blanket due to low temperature.

The fluid and observation charts from PICU are missing so I have no further detail.

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

(i) the doctor concerned

(ii) the instructions they gave you

(iii) when they gave them to you

- 200 mls human plasma protein fraction (HPPF) was given followed by 600 mls. Blood pressure fallen again at 2pm. 150 mls HPPF were given. This type of instruction would have been given by a doctor but I have no detail available as fluid balance charts for PICU are missing
- DDAVP infusion commenced because of urine excess. Drug cardex shows that this was commenced at 11am and authorised by a doctor but the signature is illegible. (090-029-089)
- Nursed on heat blanket due to low temperature. I cannot remember who instructed this.

(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

I do not recall any of above questions of 5c.

(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

(b) Where and when the discussions took place

(c) What prompted the discussions

I cannot recall anything. However, I know I would have received a verbal report from Staff Nurse Ross at 7.45am as part of routine practice regarding nursing handover from night to day staff. It would have been at patient's bedside.

(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

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

(c) Describe and explain what you reported

(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

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

(e) If Claire was not reviewed/reassessed or did not have her care/treatment changed, then please give the reasons

I do not recall any of the above questions of 7

(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

I have not recorded anything in Claire's medical notes other than 090-027-078,079, 090-027-082 to 085 and 090-027-087.

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

I do not recall.

- (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 do not recall.

- (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 recall.

- (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 do not recall

- (13) In relation to your duties 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.
- (b) Identify the consultant/s and any other clinicians who accompanied Claire when she was transferred from Allen Ward to PICU.
- (c) Identify any nurses who accompanied Claire when she was transferred from Allen Ward to PICU.
- (d) Identify the consultant or other clinician in PICU to whom Claire's care was transferred 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.
- (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.

- (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) 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.
- (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) 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
- (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.
- (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 was not on duty.

- (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.

I completed both forms according to nursing notes.

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

I don't recall why my signature does not appear.

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

From medical notes. (Ref: 090-022-058)

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

I do not recall.

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

I do not recall as I was not on duty.

- (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 do not recall.

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

Entry on medical notes dated 22/10/1996

- (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)**

Admission chart Allen Ward.

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

Medical notes.

- (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 recall.

- (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 recall.

- (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.**

I cannot recall in relation to the nursing forms 090-027-078, 079, 082-085, and 087 for the 23rd October but I have no knowledge in relation to the nursing forms 090-027-080, 081, 086 or 088 from the 22nd when I was not on duty.

- (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 cannot recall in relation to the nursing forms 090-027-078, 079, 082-085, and 087 for the 23rd October but I have no knowledge in relation to the nursing forms 090-027-080, 081, 086 or 088 from the 22nd October when I was not on duty.

- (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:**

I made entries Ref: 090-027-082 to 090-027-085, 090-027-087 according to nursing notes.

- (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 did not make this entry.

- (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 did not make this entry.

- (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 did not make this entry.

- (d) On admission, "Cardiac rate" 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 did not make this entry.

- (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 did not make this entry.

- (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 did not make this entry.

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

I did not make this entry.

- (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.

I did not make this entry.

- (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 did not make this entry.

- (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.

I did not make this entry.

(16) "Date: 22/10/96

Summary: 91/2 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.
- (b) State the time at which 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.
- (d) Explain in detail the basis upon which you describe Claire as "Epileptic" and the source of the information recorded.
- (e) State the meaning of "with ↓ level of consciousness due to ? aetiology" and the source of the information recorded.
- (f) State your understanding at that time of the cause of the respiratory arrest and the basis of that understanding.
- (g) Explain what was swollen in relation to: "CT scan showed severe swelling".
- (h) State your knowledge at the time this entry was made of Claire's serum sodium level.
- (i) Explain the reasons why no reference is made to Claire's serum sodium results and/or hyponatraemia in this summary.

I did not make this entry.

(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.

I only made the entries: "Dopamine infusion running. Temperature low."

I recorded these as this was the assessment made of Claire at time of entry.

(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.

I did not make this entry.

(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.

I cannot recall.

- (b) Specify the type of saline recorded as *"running IV 32 mls/hrly."*

Normal saline.

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

I cannot recall.

- (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 recall.

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

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

I did not make this entry.

(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.

These sheets are missing.

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

It states 5/N Saline.

- (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 cannot check this as charts are missing.

- (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)

- (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.
- (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.
- (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.
- (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
 - (ii) Claire's hyponatraemia and the cause thereof
 - (iii) Whether the serum sodium concentration or hyponatraemia caused or contributed to the cerebral oedema and/or Claire's death
 - (iv) Claire's cerebral oedema and the cause thereof
 - (v) Your diagnosis of Claire's condition including any reference to non-convulsive status epilepticus / encephalitis / encephalopathy
 - (vi) Claire's Glasgow Coma Scale and/or deteriorating level of consciousness
 - (vii) Claire's fluid regime and management

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.
- (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 was not present at these discussions.

(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.

I was present at time of death but cannot answer these questions as I do not remember.

(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) State whether the limitation of the post mortem was at the request of Claire's parents or not. If not, identify who requested a limited post mortem.
- (c) State whether a clinician requested consent for a limited post mortem only , and if so, identify that clinician and the basis of the decision to seek consent for a limited brain only post mortem.

- (d) Identify the person/s who determined that Claire should have a limited autopsy of the brain only, rather than a full post mortem and state the time at which it was decided that Claire should have a limited post mortem.
- (e) Clarify what you thought was the diagnosis at the time of referral for limited post mortem and the basis for your view at that time.
- (f) State whether it was your view that there should be a limited autopsy of the brain only and explain the basis for your view.
- (g) Explain the reasons for Claire having a "*limited autopsy of the brain only*", rather than a full post mortem, in particular given the uncertainty of Claire's diagnosis and cause of death, and the fact that SIADH can be caused by conditions outside the central nervous system (e.g. certain chest conditions including pneumonia) even if there were no physical signs pointing to those conditions when Claire died.
- (h) State whether Mr and Mrs. Roberts were asked to permit a full hospital post mortem examination, and if so, when, by whom, and the reasons why. If not, explain why not.
- (i) State exactly what Claire's parents were expressly told about the reasons for having a limited post mortem, rather than a full post mortem, and identify where this information is recorded.
- (j) Describe in detail any discussion with Mr and Mrs. Roberts whether there should be a full or limited post mortem.
- (k) Describe precisely what input Mr and Mrs. Roberts had into the decision as to whether there should be a full or limited brain only post mortem.
- (l) State whether Mr and Mrs. Roberts signed a consent form to a limited brain only post mortem. If so, please furnish a copy thereof. If not, explain why not.
- (m) Describe the policy, guidance, accepted practice and procedure on 23rd October 1996 in RBHSC on whether a full or limited post mortem should be carried out, and furnish copies of all relevant documents.

I do not recall any of above questions in 24

- (25) Explain precisely the basis upon which Claire's case was not a Coroner's case, in particular given the uncertainty of Claire's diagnosis and cause of death.
 - (a) Identify the person/s who made the decision not to refer Claire's case to the Coroner at that time.
 - (b) State the reasons why Claire's death was not referred to the Coroner at that time.
 - (c) Describe the policy, guidance, accepted practice and procedure on 23rd October 1996 in RBHSC on whether a child's death is referred to the Coroner or not, and furnish copies of all relevant documents. Also, identify all changes to that policy, guidance, accepted

practice and procedure after 23rd October 1996, and in particular by November/December 2004, and furnish copies of all relevant documents.

- (d) State whether there was a bereavement officer or bereavement service in RBHSC in October 1996 and also in December 2004 and thereafter, and if so, state the nature thereof and the date of first provision of this service and first appointment of this officer.
- (e) Explain in detail the reasons why RBHSC and/or the Trust did not conduct an internal investigation of Claire's death.

I do not recall any of above questions in 25

(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.

- (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.
- (b) Identify any other persons who were present at those 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.
- (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.
- (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 did not make any entries.

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

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.

Allocated to a particular nurse.

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

I was the allocated nurse from 7.45 am on 23.10.96 until 8 pm 23.10.96.

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

N/A

- (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 cannot as I was not on duty then.

- (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.

I cannot recall.

- (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 cannot as I was not on duty then

- (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 cannot recall.

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

Both.

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

(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

I cannot recall any of above questions in 33

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

I cannot recall any of above questions in 34

- (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.**

I do not recall.

- (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.**

No comment.

- (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.**

I do not recall

- (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

I cannot recall any communication with the family.

(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 cannot recall any of above questions in 39

(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 cannot recall.

(41) Since 23rd October 1996:

- (a) State your knowledge and awareness of the case of Adam Strain, his Inquest and the issues arising from

- (b) State the source of your knowledge and awareness and when you acquired it
- (c) Describe how that knowledge and awareness affected your work

I do not recall.

(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 am now retired and do not have a comprehensive record of all the training I undertook while in practise.

(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

I do not recall.

(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**

I do not recall.

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

I do not recall.

(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: *Margaret Wilkin*

Dated: *02-01-2012*