

Witness Statement Ref. No.

225/1

NAME OF CHILD: Claire Roberts

Name: Mrs Angela Pollock

Title: Service Coordinator, Medical and Ambulatory Paediatrics, Royal Belfast Hospital for Sick Children.

Present position and institution:

Service Coordinator, Medical and Ambulatory Paediatrics, Royal Belfast Hospital for Sick Children.
Since June 2009.

Previous position and institution:

Ward Sister, Allen Ward , Royal Belfast Hospital for Sick Children.

Membership of Advisory Panels and Committees:

[Identify by date and title all of those between January 1995-December 2011]

Previous Statements, Depositions and Reports:

[Identify by date and title all those made in relation to the child's death]

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 undertook my post registration Children's Nurse training at RBHSC from 20/10/86 until 20/12/87. I was then employed as a D Grade Staff Nurse in A&E from 21/12/87-10/1/88 at which time I moved to Allen Ward and remained as a Staff nurse there until 30/11/90 when I was promoted to "F" Grade Sister on 1/12/90. I remained on Allen Ward in this post until 31/1/94 when I was promoted to the post of "G" Grade Sister on 1/2/94. I remained in this post until 14/6/09 when I took up my present post as Service Coordinator, Medical & Ambulatory Paediatrics, RBHSC on 15/6/09.

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

I cannot recall the times at which I was on duty during this time.

- (a) Whether you were present in the hospital

I cannot recall

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

I did not work on an on-call rota.

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

I can recall having a conversation with Claire's parents during this period, however I cannot recall the detail of that conversation.

- (3) Explain what your role as 'ward sister' / 'nurse in charge' between 21st and 23rd October 1996 entailed, particularly in relation to other nurses on the ward.

My role at this time entailed having responsibility for the nursing care of patients on Allen Ward. This includes the overall management of Allen Ward including the deployment, supervision and teaching of students and other staff. I had responsibility for the professional development of staff and for formulating duty rotas to ensure that the ward had adequate cover.

- (4) State the number of wards which you covered whilst on duty on 21st, 22nd and 23rd October 1996, and the nature of each ward.

My responsibility would be to cover only Allen Ward during this time but I may have been the Bleep Holder for RBHSC. I cannot recall if I was the bleep holder for RBHSC in which case I would have covered all areas of RBHSC as the senior nurse on duty. The Bleep holder for RBHSC during the day would have been one of the ward sisters and at night would have been one of the night sisters.

(5) Explain the reporting lines that existed in Allen Ward in October 1996 in relation to:

(a) Your role as 'ward sister' / 'nurse in charge'.

Nurses on the ward would have reported directly to me when I was on duty. In my absence the nurses would report to a senior staff nurse in charge of the ward in my absence.

(b) Junior doctors and Registrars

Junior Doctors and Registrars would report to the Consultant in charge of that patient.

(c) Consultants *Consultant's held final responsibility for the care of their patients.*

if a nurse was concerned about a child on the ward.

(6) State whether the culture of RBHSC between 21st and 23rd October 1996 at the time enabled nurses to raise concerns freely with medical and more senior nursing staff.

The culture at this time would have enabled nurses to freely raise any concern with medical and more senior nursing staff.

(a) State whether there was a policy which provided nurses and other staff with guidance about raising concerns.

I cannot recall

(7) Explain the policy and procedure at the RBHSC in October 1996 for nurses contacting:

(a) you as the 'ward sister' / 'nurse in charge' about new admissions or seriously ill children.

I cannot recall a policy, however if a nurse had a concern about a new admission or seriously ill child they would discuss this with me as ward sister or whichever nurse was in charge of the ward in my absence.

(b) a registrar on the appropriate clinical team directly, if they were unhappy with the SHO's/junior doctor's response

I cannot recall a policy, however if a nurse was unhappy with an SHO/junior doctors response about a new admission or seriously ill child they would discuss this with the Registrar.

(c) The on call consultant responsible for the patient directly, if they were unhappy with the responses of SHO/Registrar

I cannot recall a policy, however if a nurse was unhappy with a Registrar's response about a new admission or seriously ill child they would discuss this with the Consultant responsible for the child's care.

- (d) State whether such contact required the sanction of a particular person, and if so, state who

Such contact would not require the sanction of any person. The practice would normally be to raise a concern with the JHO first, then the SHO, Registrar and Consultant.

- (8) State what induction and training the nursing staff were given prior to 21st October 1996 in relation to reporting concerns about a child's condition or management. Explain how this induction was monitored and recorded.

I cannot recall

- (9) State whether there were 2 trained children's nurses on each shift in Allen Ward between 21st and 23rd October 1996, and if so, identify those children's trained nurses on duty during that period. *I cannot recall who was on duty on each shift during this time period. There would have been a minimum of two trained children nurses on duty on all shifts during this time.*

- (10) 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 would not have had any involvement with Claire and her family until her arrival on Allen Ward.

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

My role as ward sister of Allen Ward during this time would have been as the nurse who had overall responsibility for the nursing staff who provided Claire's nursing care.

- (c) From admission to PICU until her death

I would not have had any involvement with Claire and her family during her admission to PICU.

- (11) In regard to Claire's medical notes and records, identify precisely the entries that you made or which were made on your direction and state below:

- (a) When each of the identified entries was made

I did not make any entries in Claire's medical notes or records.

- (b) The source of the information recorded in the entry

I did not make any entries in Claire's medical notes or records.

(12) Describe and explain any discussions you had with any doctors and/or nursing staff in relation to Claire whilst you were on duty between her attendance at A&E on 21st October 1996 and 23rd October 1996, including:

- (a) The identity of the person concerned
- (b) Where and when the discussions took place
- (c) What prompted the discussions
- (d) The nature of the discussion
- (e) Where the discussion is recorded, and
- (f) What happened as a result of the discussion

I cannot recall any discussions that I had with any doctors and/or nursing staff in relation to Claire whilst I was on duty during the period from 21/10/96 and 23/10/96. The practice on the ward at that time would be for myself as Sister or whichever nurse was in charge of the ward in my absence to take part in the daily ward round with medical colleagues. During this time discussion would take place about all patients on the ward at that time and treatment plans for particular patients would be discussed. The medical staff would document findings of clinical examination of the patient at the time of the ward round in the clinical notes and if particular tests were required following the ward round this would be documented in the ward round diary. Under the Belfast Health and Social Care Trust Policy for disposal of records this diary would now be disposed of. This information would be passed on to whichever nurse was looking after that patient to carry out and to the junior medical staff if tests such as blood tests were required.

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

I cannot recall checking what was written in the medical and nursing notes and records about Claire at any time.

(14) State whether:

- (a) the fluid balance and IV prescription sheet
- (b) observation charts
- (c) neurological observations chart
- (d) seizure chart
- (e) nursing notes and

(f) nursing care plan

(g) medications chart

were completed to the standard which you would have expected in October 1996, and state the reasons for your answer.

I do not recall when I was on duty or seeing the entries in Claire's notes so cannot comment.

(15) State whether you were present at any time while Claire was being examined by a clinician, and if so, identify the clinician 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 recall being present during a time that Claire was being examined by a clinician.

(16) State when you commenced duty on Allen Ward between 21st and 23rd October 1996 whether there was a 'handover' to you in relation to Claire.

(a) If so, identify the person who conducted that 'handover' and state the information communicated to you about Claire at that time and where that was recorded

I cannot recall, however at this time the practice was that a member of night staff would "handover" to day staff at the start of the morning shift at 07.45 am and in the evening from day to night staff at 20.00hours. Handovers would also have been held during the lunchtime period depending on the shifts that the nurses on duty were working.

(b) State whether you reviewed Claire and her charts following handover and whether you discussed her condition with her family.

As ward Sister my practice would have been to go around all of the patients on the ward following the "handover" to see the patients and their families. If parents were in attendance at this time I would always have introduced myself and provided them with a brief update as to how the day would be organised in terms of when the Doctor would see them and their child. I would have answered questions that the parents would have at this time also and at any other time if parents wished to speak with me. I cannot recall if I reviewed Claire's charts following the handover.

(17) State if you were made aware of Claire's admission by the night sister.

I would not have expected night sister to have informed me of Claire's admission.

(18) State whether you requested any information from the ward about Claire's condition, and if so, state when and explain why you did so.

I cannot recall.

(19) Identify the person/s who were responsible for informing the nursing staff on Allen Ward of the reasons for Claire's admission and the ongoing diagnosis of Claire's condition.

The practice at the time of Claire's admission to Allen Ward for informing the nursing staff on the ward of her admission would have been a handover from the nurse from the Accident and Emergency Department

to the nurse on Allen Ward. Responsibility for informing the nursing staff on Allen Ward of Claire's ongoing diagnosis would be the medical staff who were on call during the night of her admission and the medical staff who provided her ongoing care on the ward after her initial admission.

(20) State whether any nurses on Allen Ward consulted you in relation to any concerns about Claire between 21st and 23rd October 1996, and if so:

(a) Identify which nurses consulted you and state when each nurse consulted you

I cannot recall

(b) Describe the concerns raised with you and what was done about each concern raised

I cannot recall

(c) State whether you made an assessment of Claire upon concerns being raised

I cannot recall

If not, identify any matters of concern in relation to Claire which you would have expected nurses on Allen Ward to raise with you, and explain when and why you would have expected these matters to have been raised with you.

(21) State whether you were informed / made aware of the following:

(a) The change in Claire's provisional diagnosis to "Non fitting status / encephalitis / encephalopathy" (Ref: 090-022-053)

I cannot recall

(b) Claire's failure to pass urine for 8 hours between 11.00 and 19.00 on 22nd October 1996

I cannot recall

(c) When the hourly observations and Glasgow Coma Scale scores were introduced

I cannot recall

(d) When additional intravenous therapy was prescribed

I cannot recall

(e) When Claire was no longer eating and drinking due to her deteriorating level of consciousness

I cannot recall

(f) The fall in her Glasgow Coma Score to 7 at 15.00, 18.00 and 19.00 and to 6 at 16.00, 17.00 and from 21.00 onwards on 22nd October 1996

I cannot recall

- (g) The attack recorded at 15.10/15.25 on 22nd October 1996 (Ref: 090-042-144)

I cannot recall

- (h) Claire's condition from 17.00 onwards of being "Very unresponsive - only to pain. Remains pale" (Ref: 090-040-141)

I cannot recall

- (i) Claire's "Occasional episodes of teeth clenching" (Ref: 090-040-141) at 16.30 and 19.15 (Ref: 090-042-144)

I cannot recall

- (j) Claire's raised blood pressure of 130/70 recorded at 19.00

I cannot recall

- (k) Claire's "episode of screaming and drawing up of arms" at 21.00 (Ref: 090-042-144)

I cannot recall

- (l) Claire's systolic blood pressure readings in excess of 120 and Claire's respiratory rate being elevated at times at 30 breaths per minute on 22nd October 1996 (Ref: 090-039-137)

I cannot recall

If you were informed of any of the above, state when and by whom, and whether this prompted a reassessment and review of Claire's care plan either by the allocated staff nurse or by you to provide more intensive nursing input and explain the outcome of any such reassessment or review. If you were not informed or made aware of the above, explain why not.

I cannot recall any of the above.

- (22) State whether you believe either the medical team and/ or you (in your role as 'ward sister' / 'nurse in charge') ought to have been informed / made aware of the following, and explain why you believe the medical team and/or you ought / ought not to have been informed / made aware of:

- (a) The change in Claire's provisional diagnosis to "Non fitting status / encephalitis / encephalopathy" (Ref: 090-022-053)
- (b) Claire's failure to pass urine for 8 hours between 11.00 and 19.00 on 22nd October 1996
- (c) When the hourly observations and Glasgow Coma Scale scores were introduced

- (d) When additional intravenous therapy was prescribed
- (e) When Claire was no longer eating and drinking due to her deteriorating level of consciousness
- (f) The fall in her Glasgow Coma Score to 7 at 15.00, 18.00 and 19.00 and to 6 at 16.00 and 17.00 and from 21.00 onwards on 22nd October 1996
- (g) The seizure recorded by Claire's mother at 15.10/15.25 on 22nd October 1996 (Ref: 090-042-144)
- (h) Claire's condition from 17.00 onwards of being *"Very unresponsive - only to pain. Remains pale"* (Ref: 090-040-141)
- (i) Claire's *"Occasional episodes of teeth clenching"* (Ref: 090-040-141) at 16.30 and 19.15 (Ref: 090-042-144)
- (j) Claire's raised blood pressure of 130/70 recorded at 19.00
- (k) Claire's *"episode of screaming and drawing up of arms"* at 21.00 (Ref: 090-042-144)
- (l) Claire's systolic blood pressure readings in excess of 120 and Claire's respiratory rate being elevated at times at 30 breaths per minute on 22nd October 1996 (Ref: 090-039-137)

As ward sister I would expect to be told of any of the above changes referred to in points a-l in relation to any child under the care of staff on my team.

(23) In relation to Claire's Nursing Care Plan (Ref: 090-043-145 and 090-043-146):

- (a) State whether in your view Claire's Nursing Care Plan reflected the potential severity of Claire's condition and the reasons for your answer.

I do not recall seeing Claire's nursing care plan while she was in Allen Ward.

- (b) Identify who was responsible on Allen Ward for monitoring the quality of Nursing Care Plans, and in particular, Claire's nursing care plan.

The ward sister would be responsible for nursing care plans.

- (c) State how often the Nursing Care Plan is reviewed.

Daily or more frequently as a patient's condition changes.

- (d) Identify the person who determined the frequency of review of the Nursing Care Plan.

G McRandal has recorded this on Claire's nursing care plan on the 21st October 1996.

- (e) State the reasons why the Nursing Care Plan was to be reviewed daily, rather than more frequently.

The review of a nursing care plan is the judgement of the nurse writing it.

- (f) State the times when Claire's Nursing Care Plan ought to have been reviewed between 21st and 23rd October 1996 and the reasons why.

The review of a nursing care plan is the judgement of the nurse writing it

- (g) State if you had any responsibility for overseeing or reviewing the Nursing Care Plan, and if so, state whether you considered reviewing the Nursing Care Plan more frequently and if so, state when, why and the outcome of your consideration. If you did not consider this, state the reasons why not. If you did not have responsibility for overseeing or reviewing the Plan, identify the person who was responsible for this.

As ward Sister I had responsibility for overseeing all nursing care on Allen Ward at this time, however I do not recall seeing Claire's nursing care plan during her admission.

- (h) State whether a change in diagnosis by a doctor, such as status epilepticus, triggers a review of the Nursing Care Plan and explain the reasons for your answer.

A change in diagnosis may lead to a review of the nursing care plan as a change in nursing care may be required.

- (24) Identify who, between Claire's admission on 21st October 1996 and 04.00 on 23rd October 1996:

- (a) Determined the observations to record in relation to Claire, the frequency of those observations and any changes to those observations.

The medical staff responsible for Claire during this time would have determined the observations and the frequency of those observations. Nursing staff who looked after Claire would be responsible for reporting any changes in those observations to the medical staff.

- (b) Oversaw that determination and any changes in observations.

The medical staff responsible for Claire during this time would have determined the observations and the frequency of those observations. Nursing staff who looked after Claire would be responsible for reporting any changes in those observations to the medical staff.

- (25) State your role and involvement in:

- (a) Determining the observations to record in relation to Claire
(b) The frequency of those observations and
(c) Any changes to those observations

between Claire's admission on 21st October 1996 and 04.00 on 23rd October 1996, and explain the reasons for any decisions or actions taken by you on those matters.

I cannot recall.

(26) State whether, between 21st October 1996 and Claire's respiratory arrest on 23rd October 1996, consideration was given to:

(a) providing 1:1 nursing to Claire on Allen Ward

I do not recall.

(b) admitting Claire to PICU

I do not recall.

(c) admitting Claire to the High Dependency Unit (HDU)

I do not recall.

If so, identify by whom, and state when and what was the outcome of that consideration.

If not, explain why not and state whether consideration ought to have been given during that period of time. If so, state when, by whom and explain the reasons why. If it ought not to have been considered, explain why not.

I do not recall.

(27) State the protocols, guidelines and procedures in RBHSC between 21st and 23rd October 1996 governing admission of children to:

(a) PICU

I cannot recall any protocols, guidelines and procedures

(b) HDU

I cannot recall any protocols, guidelines and procedures

(28) Identify the criteria for admission to:

(a) PICU

I cannot recall if there were criteria, however this would have been a medical decision

(b) HDU

I cannot recall if there were criteria, however this would have been a medical decision.

in RBHSC in October 1996 and state whether Claire satisfied that criteria on 21st or 22nd October 1996. If so, state when and in what respects. If not, explain why not.

- (29) State whether you would have expected Claire's urine output to have been measured on Allen Ward between 21st and 23rd October 1996. If so, state when and how it ought to have been measured. Explain the reasons for your answer.

I would have expected Claire's urine output to have been measured if nurses had been instructed to do so by the medical staff.

- (30) Explain how nurses on Allen Ward in October 1996 would have become aware of a transfer of responsibility for a patient from a paediatric consultant to a specialist consultant, and state where this would have been recorded and also whether this would have been raised at nursing handover(s).

The nurses would have been told by the medical staff that responsibility for a patient had been transferred to another Consultant. I cannot recall how this would have been recorded.

- (31) Identify the Consultant whom you believed to be responsible for Claire and her management, care and treatment between her admission on 21st October 1996 and her death on 23rd October 1996, and explain the basis for your belief.

I believe that Dr Heather Steen and Dr David Webb were responsible for Claire and her management during this time.

- (a) In particular, identify the paediatric Consultant who was responsible for Claire's care, treatment and management from 17.00 on 22nd October 1996 and thereafter

I believe that Dr Heather Steen and Dr David Webb were responsible for Claire and her management during this time.

- (32) State what type of nursing operated on Allen Ward between 21st and 23rd October 1996, i.e. named nursing, patient allocation or team nursing.

- (a) State whether between 21st and 23rd October 1996, the nursing care and management of Claire was allocated to a particular nurse, or to a nursing team

A team of nurses would have provided nursing care to Claire.

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

A team of nurses would have provided nursing care to Claire.

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

A team of nurses would have provided nursing care to Claire.

- (33) Identify the members of the paediatric medical team on duty from 21st October 1996 to 23rd October 1996, and their respective job titles.

I cannot recall

- (34) Identify the members of the nursing team on duty from 21st October 1996 to 23rd October 1996 on Allen Ward and their respective job titles.

I cannot recall

- (35) Describe the communications that you had with the Consultant responsible for Claire on her admission, including:

- (a) Time of each communication

I cannot recall

- (b) Means by which the communication was made

I cannot recall

- (c) Nature of each communication

I cannot recall

- (d) Whether any advice or direction was given by the Consultant in relation to Claire's treatment and care, and if so the nature of that advice or direction

I cannot recall

- (36) State what contact you had with Dr. Heather Steen in relation to Claire between 21st October 1996 and c. 04.00 on 23rd October 1996 including:

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

I cannot recall

- (b) Identify who initiated each contact and the reason for each contact being made

I cannot recall

- (c) State what information you gave Dr. Heather Steen about Claire during each contact

I cannot recall

- (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 contact

I cannot recall

- (e) Identify any document where each contact is recorded and produce a copy thereof

I am not aware of any documents.

- (f) If no contact was made, explain why not

I cannot recall

- (g) State whether Dr. Steen attended and examined Claire at any time between Claire's attendance at A&E on 21st October 1996 and 04.00 on 23rd October 1996, and if so, state the date, time and location of that attendance and examination

I cannot recall

- (37) State what communication you had with Dr. David Webb in relation to Claire between 21st October 1996 and c. 04.00 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.

I cannot recall

- (b) Identify who initiated each communication and the reason for each communication being made

I cannot recall

- (c) State what information you gave Dr. David Webb about Claire during each communication

I cannot recall

- (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

I cannot recall

- (e) Identify any document where each communication is recorded and produce a copy thereof

I cannot recall

- (f) If no communication was made, explain why not

I cannot recall

- (38) On completion of your working shift between 21st and 23rd October 1996, state whether the nursing care of Claire was handed over to a specific nurse or a nursing team. If the former, identify that nurse and her job title. If the latter, identify the members of that nursing team and state the reasons why Claire's care was not transferred to a specific individual nurse at that time.

From Claire's records I note that Staff Nurse G McRandal, Staff Nurse S Field, S/N P Ellison and S/N L McCann have all made entries in Claire's nursing records.

- (a) State whether you had a 'handover' with that nurse/nursing team prior to the nursing shift change

The practice at the time was to have nursing "handover" at 07.45 am and at 20.00 hours in the evening. All nurses on duty would be given handover as a group following which nurses would be allocated to care for a group of patients. I cannot recall the nurses who were on duty during this time other than I can from Claire's records which nurses have made entries in Claire's nursing documentation during this time.

- (b) If so, state the information about Claire you communicated to her/that team during that handover

I cannot recall

- (c) State whether Claire's parents were involved in the handover and, if not, whether you informed them of the content of this before finishing your shift

Parents would not be involved in the nursing handover.

- (d) If you did not carry out the handover, identify the person who did so and their job title

I cannot recall

- (39) 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 know who completed this document. The practice in RBHSC at that time and now is that when a child is admitted via A&E one of these documents would be placed in the child's notes in preparation for his/her discharge from RBHSC. This would usually be completed by administrative staff at the admissions office, RBHSC.

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

I cannot recall

- (41) 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.

- (42) 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.

I cannot recall

(b) Identify to whom you passed on the information that you received.

I cannot recall

(c) State when and where you told them this information.

I cannot recall

(d) Identify where the information you communicated/received is recorded or noted.

I cannot recall

(e) State whether you recorded Claire's parents'/family's understanding of the information that you gave them and their concerns.

I cannot recall

(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.

I cannot recall

(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

(h) State whether you informed Claire's parents/family why the observations were being made, and where this is recorded.

I cannot recall

(43) Describe what information ought to have been communicated to Claire's parents/family on 21st, 22nd and 23rd October 1996, and state by whom, when this ought to have been communicated and the reasons why.

The medical staff would be responsible for communicating information to Claire's parents.

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

(a) With nursing colleagues

I cannot recall any audit and learning that I was involved in relating to the death of Claire.

(b) Within the department

I cannot recall any audit and learning that I was involved in relating to the death of Claire.

(c) As an individual

I cannot recall any audit and learning that I was involved in relating to the death of Claire.

(45) Prior to 21st October 1996:

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

I have no recollection of the case of Adam Strain, his inquest or the issues arising from it.

- (b) State the source of your knowledge and awareness and when you acquired it

I do not recall having any knowledge or awareness.

- (c) Describe how that knowledge and awareness affected your care and treatment of Claire

I do not recall having any knowledge or awareness.

(46) Since 21st October 1996:

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

My knowledge and awareness of the case of Adam Strain, his inquest and the issues arising from it came to my attention when the case was made public through the media.

- (b) State the source of your knowledge and awareness and when you acquired it

The source of my knowledge was through the media, however I cannot recall when I acquired this knowledge.

- (c) Describe how that knowledge and awareness affected your work

I cannot recall how this affected my work.

(47) 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

I completed General Nurse Training at the Royal Victoria Hospital from July 1981-September 1984. This included a module on the care of sick children and included a placement on Barbour Ward ,RBHSC. Due to the passage of time I cannot recall the specific training and education that I received in relation to points a-h

- (ii) Postgraduate level

I completed Children's Nurse Training from October 1986-December 1987 in RBHSC. This included placements on several of the children's wards in RBHSC. Due to the passage of time I cannot recall the specific training and education that I received in relation to points a-h.

- (iii) Hospital induction programmes

I commenced my post as a Staff Nurse on Allen Ward in January 1988. Due to the passage of time I cannot recall the training and education that I received in relation to points a-h..

- (iv) Continuous professional development

I completed the BMJ module "Reducing the risk of hyponatraemia when administering Intravenous Infusions to Children" 2007

- (48) 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

I worked on Allen Ward as a staff nurse from January 1988 and then as Ward Sister from December 1990 until June 2009. I cannot recall the numbers of patients with hyponatraemia.

- (b) Number of the children who were aged less than 10 years old

I cannot recall the numbers of patients who were aged less than 10 years old with hyponatraemia

- (c) Nature of your involvement

I cannot recall my involvement in any specific case

- (d) Outcome for the children

I cannot recall any outcomes

- (49) 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

I was Ward Sister of Allen Ward until June 2009. I cannot recall the numbers of patients with hyponatraemia.

- (b) Number of the children who were aged less than 10 years old

I cannot recall the numbers of patients who were aged less than 10 years old with hyponatraemia.

- (c) Nature of your involvement

I cannot recall my involvement in any specific case.

- (d) Outcome for the children

I cannot recall any outcomes

- (50) Identify any 'Protocols' and/or 'Guidelines' which governed Claire's care and treatment in 1996.

I cannot recall any protocols and/or guidelines which governed Claire's care and treatment in 1996.

- (51) 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:

Angele K. Pollock

Dated: 15/2/12