

#### **Directorate of Legal Services**

PRACTITIONERS IN LAW TO THE \_\_\_\_\_\_
HEALTH & SOCIAL CARE SECTOR:

2 Franklin Street, Belfast, BT2 8DQ DX 2842 NR Belfast 3

Your Ref: AD-0350-12 Our Ref: HYP B04/01 Date: 03.05.12

RECEIVED

04 MAY 202

INQ-0891-12

Ms A Dillon Solicitor to the Inquiry Arthur House 41 Arthur Street Belfast BT1 4GB

Dear Madam,

#### RE: INQUIRY INTO HYPONATRAEMIA RELATED DEATHS

I refer to the above and your letter of 1st May 2010. I am instructed as follows: -

 I would refer you to Ms Begg's letter of 24<sup>th</sup> August 2010 which encloses a plan indicating that the operating theatre (coloured red on your map 300-005-005) as being that in which Adam Strains transplant took place. I am instructed that this information was obtained from Dr Bob Taylor.

The Trust subsequently became aware of the issue which you are now raising following the Inquiry's inspection of the RBHSC on 20<sup>th</sup> September 2011. I would ask you to note that this matter was drawn to your attention in correspondence from Ms Beggs dated 10<sup>th</sup> October 2011. You will note that this letter indicates that Dr Taylor had advised that to the best of his recollection the Orthopaedic theatre (the theatre coloured red on map 300-005-005) was used for Adam Strain's surgery.

However the Inquiry's attention was also drawn to the fact that that Dr. Montague refers in his witness statement WS 009/3 page 2, Q2a to being in the anaesthetic room which was across the corridor from the theatre when Adam and his mother went into theatre. This would indicate that he believes the surgery was performed in Theatre 2 (the theatre coloured green on your map 300-005-005) and not the orthopaedic theatre as indicated by Dr Taylor.

Redacted copies of the nursing notes in relation to the second theatre that was in use are enclosed herewith. These nursing notes relate to the cases in which Dr Campbell

Providing Support to Health and Social Care







was involved and for which you already hold the theatre log. You will note that these records list the theatre in use for those procedures as "Theatre 2". I am instructed that this information would suggest that it is unlikely that Adam Strain's transplant took in place Theatre 2.

3) I am instructed that the Trust is searching for these documents at present and I will forward same to you as soon as possible.

Yours faithfully,

Joanna Bolton

Solicitor Consultant

Email:

Tel:



Your Ref:

Our Ref: HYP B04/1

Date: 10.10.11

Mrs Bernie Conlon Secretary to the Inquiry Arthur House 41 Arthur Street Belfast BT1 4GB

Dear Madam.

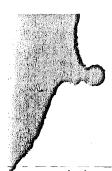
#### RE: INQUIRY INTO HYPONATRAEMIA RELATED DEATHS

I refer to the above and the Inquiry's visit to the Royal Belfast Hospital for Sick Children on 22nd September 2011. During that visit Dr Booker posed questions about the theatre in use for Adam Strain's operation. I am instructed that Dr Taylor has advised that to the best of his recollection the Orthopaedic theatre was allocated for use for the case. If that was the theatre used, the ceiling cluster of anaesthetic gas tubing nearest the adjacent theatre would have been utilised. I am instructed that the orientation of the patient and anaesthetic machine in theatre would have placed the patient's head towards the autoclave and feet towards the recovery room. The anaesthetic machine would have been on Adam Strain's left at the head of the table.

Dr. Montague has recently indicated his wish to be represented by the Trust's legal representatives at the Hearing and has now provided copies of his Witness Statements 009/1,009/2, and 009/3. Dr. Montague refers in 009/3 page 2, in his answer to Q2a as to where he was when Adam and his mother went into theatre that he was in the anaesthetic room which was across the corridor from the theatre. This would indicate that he believes the surgery was performed in Theatre 2 i.e. not the orthopaedic theatre. The Trust wishes the Inquiry to note this inconsistency.

A request for photographs of the theatres as they were in 1995 was also made. I am instructed that whilst it was not possible to locate any photographs from 1995 two photographs from 1997 have been located. I enclose copies of same for your consideration.

Furthermore Dr. Booker and Mr. Kershaw asked whether the RVH Biochemistry Kelvin Laboratories were fully manned out of hours in 1995, I understand that at the time they were advised that this was the case. However I am instructed that although the Biochemistry Kelvin



Laboratories are currently fully manned out of hours, the correct position as regards 1995 is as set out in my letter of 3<sup>rd</sup> November 2010 (AD-0154-10). Mr. Walby has asked that I forward his apologies for his error.

This completes the Trust's response to the requests made during the aforementioned visit.

Yours faithfully

JB

Wendy Beggs Assistant Chief Legal Adviser

Direct	Line	
Fax:		
Email		

Your Ref. AD-0156-10

Our Ref: NSC B04/1

Date: 24 August 2010

Ms Anne Dillon Solicitor to the Inquiry Arthur House 41 Arthur Street Belfast BT1 4GB

Dear Madam

# RE: INVESTIGATION INTO THE DEATH OF ADAM STRAIN

I refer to the above and to letter dated 21st July 2010.

I enclose layout plans for the RBHSC and RVH site circa 1993. They had not changed renarding the fundamental points by the time of Adam Strain's transplant in November regarding the undemoted points by the time of Adam Strain's transplant in November

- 1. Musgrave Ward is marked on the RBHSC plan.
- 2. Adam Strain was anaesthetised in the operating theatre marked by a cross on the 3. The operating theatre used for Adam Strain's transplant is marked as in 2.
- 4. The haematology laboratory based in the RBHSC marked on the RVH plan is not relevant to the care of Adam Strain. It is used to analyse samples in working hours from the Haematology Ward. The remainder of the RBHSC had its blood samples analysed in the main RVH laboratoriae. The Haematology and Biochamistry laboratoriae where in the main RVH laboratories. The Haematology and Biochemistry laboratories where
- Adam Strain's blood samples were analysed are marked on the RVH site plan. 5. The Recovery Room is marked on the RBHSC plan.
- The Paediatric Intensive Care Unit is marked on the RBHSC plan. The location of the blood gas analyser machine in PICU is marked with a cross as requested in your letter of the 20th July 2010 (AD-0154-10.)

The date of the first paediatric renal transplant performed in the RBHSC will have been the Raiset Health and Social Care Trust Was actablished. The Eastern Health are Ine date of the first paediatric renal transplant performed in the RBHSC will have been before the Belfast Health and Social Care Trust was established. The Eastern Health and Social Care Trust was established. The Eastern Health and Social Care Trust was established. Social Services Board will have been the responsible body prior to 1st April 1993 when the Royal Group of Hospitals and Dental Hospital Hoop Truet was actablished. The Truet is Royal Group of Hospitals and Dental Hospital HSS Trust was established. The Trust is Currently preparing the information requested. Unfortunately, due to changes in data

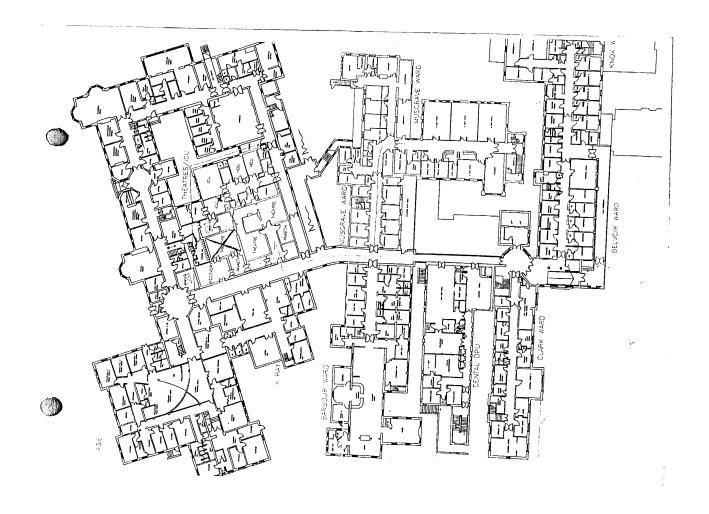
storage systems the information is not available electronically but it is currently being obtained by the Paediatric Renal Unit. When the patient details are known the records of each child will have to be retrieved from storage in some cases to answer the specific clinical questions asked. We are endeavouring to have this information with you as soon as possible.

Yours faithfully

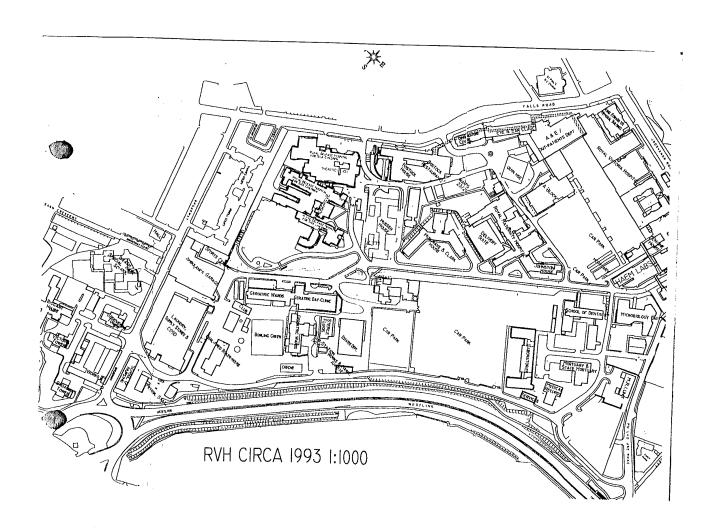
Wendy Beggs Assistant Chief Legal Adviser

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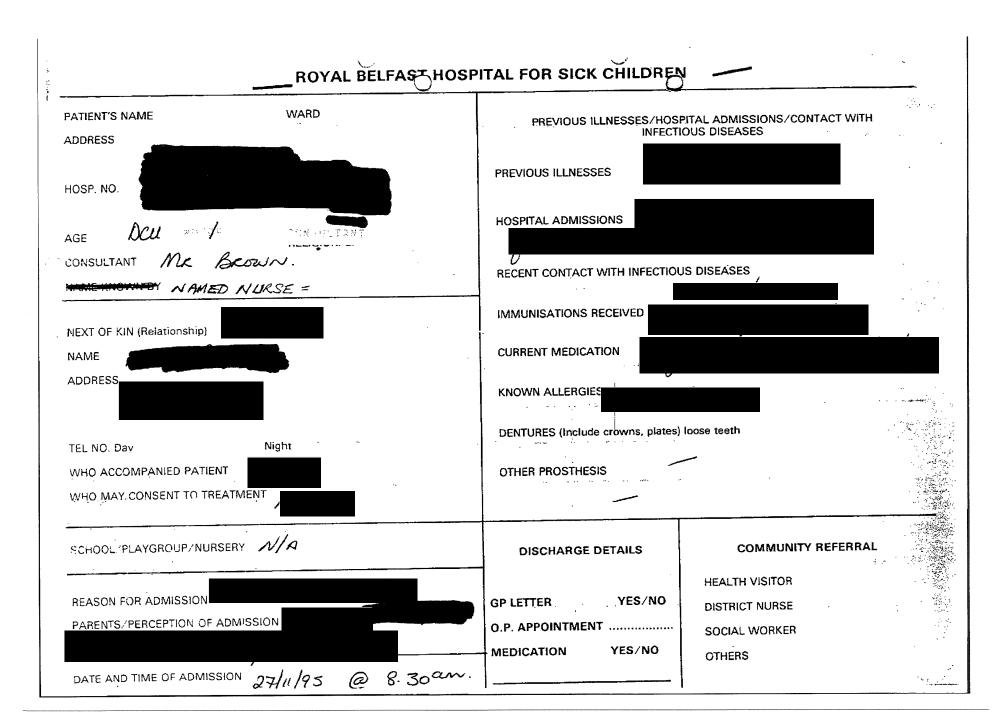
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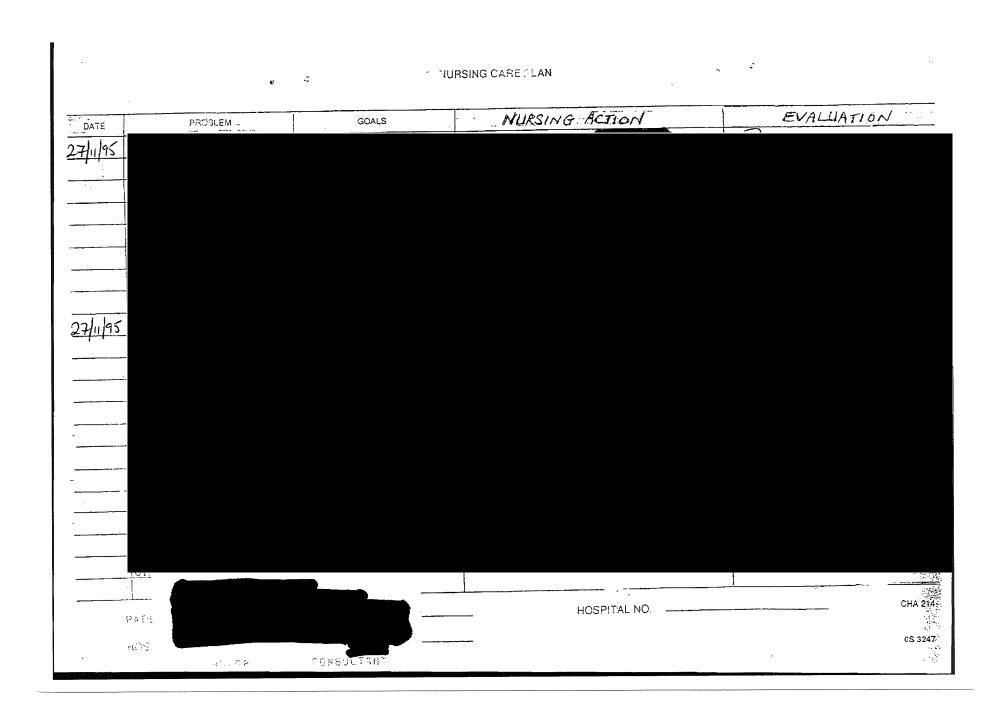


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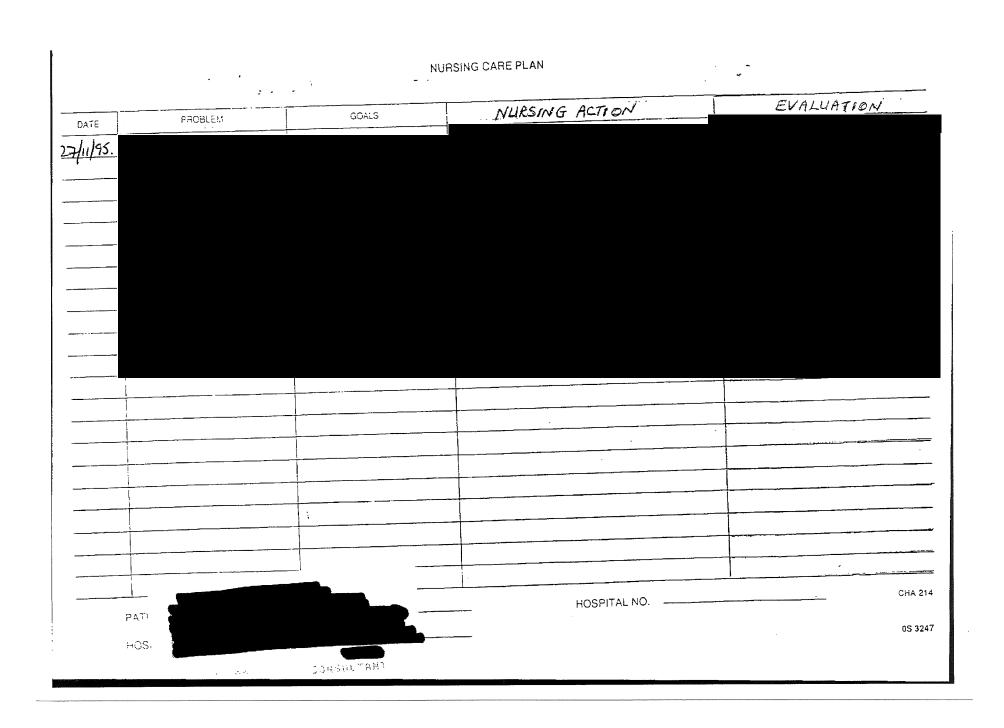


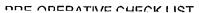
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### ROYAL BELFAST HOSPITAL FOR SICK CHILDREN. NURSING CARE PLAN NURSING ACTION EVALUATION PROBLEM -DATE **GOALS** HOSPITAL NO. -PATIENT'S NAME \_\_ 0\$ 3247 HOSP.

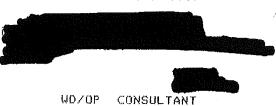




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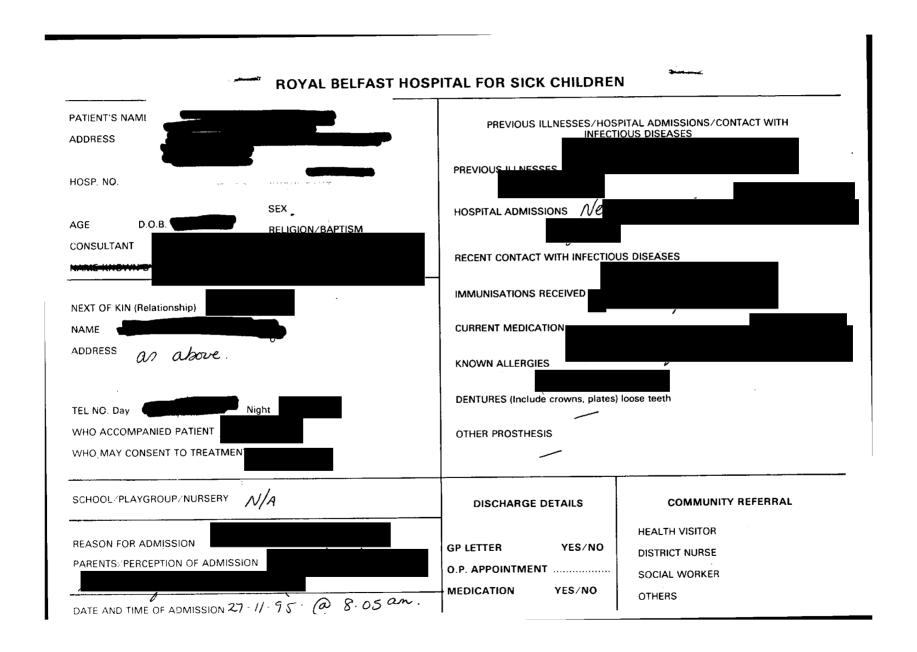


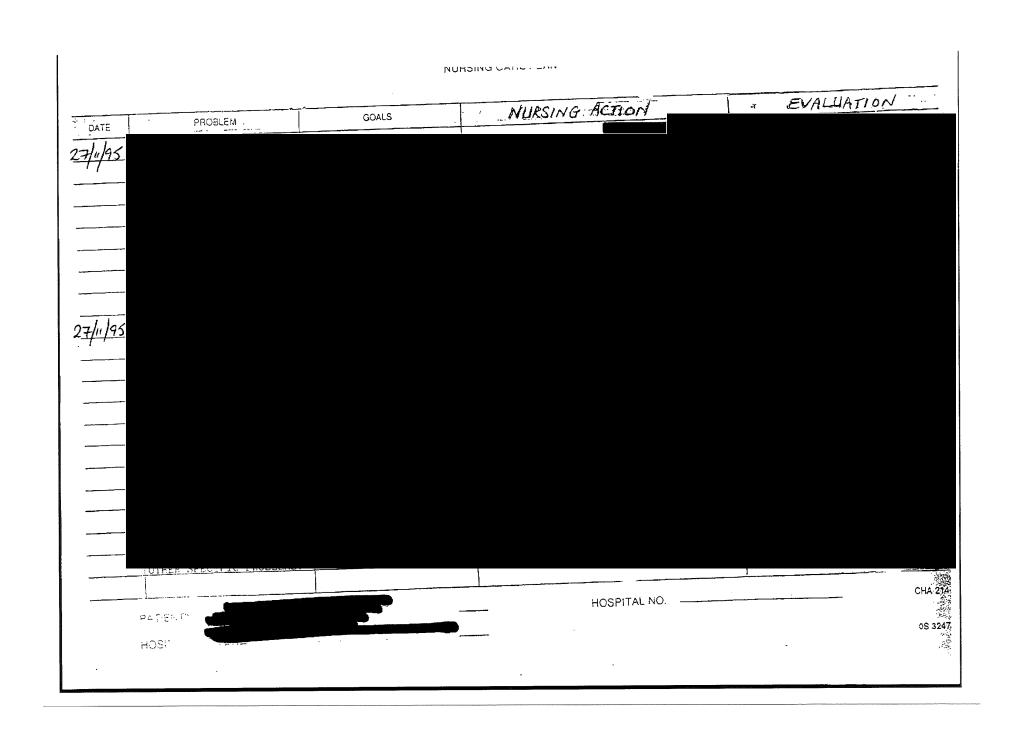
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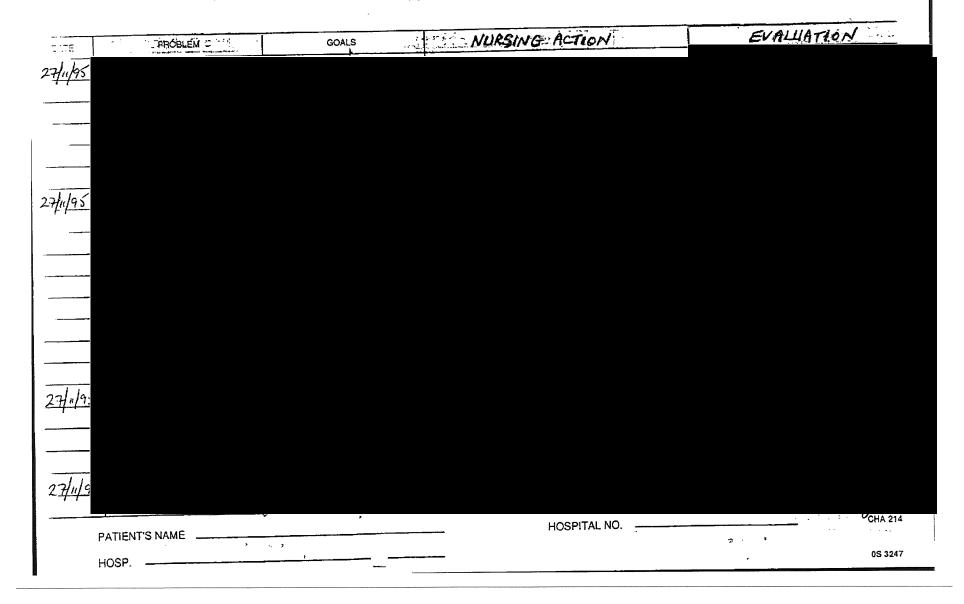
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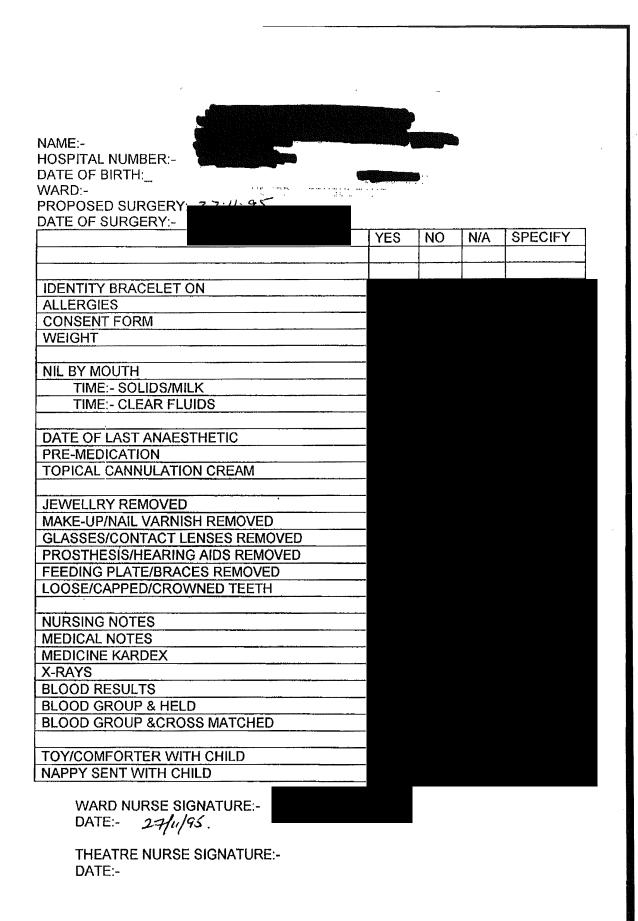
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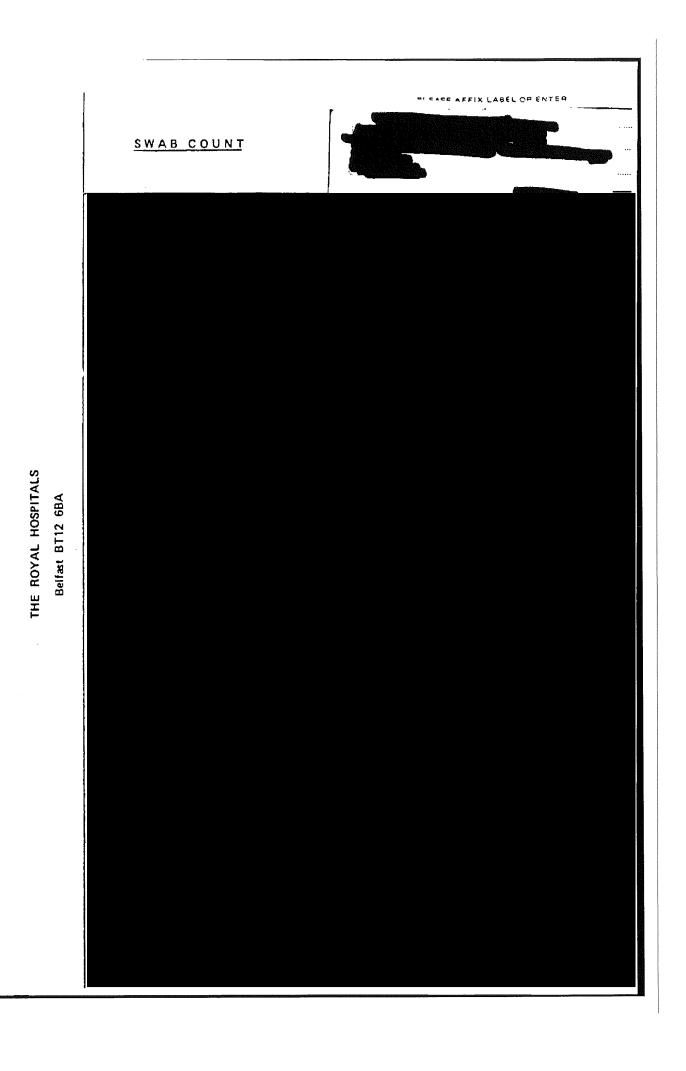
#### NURSING CARE PLAN



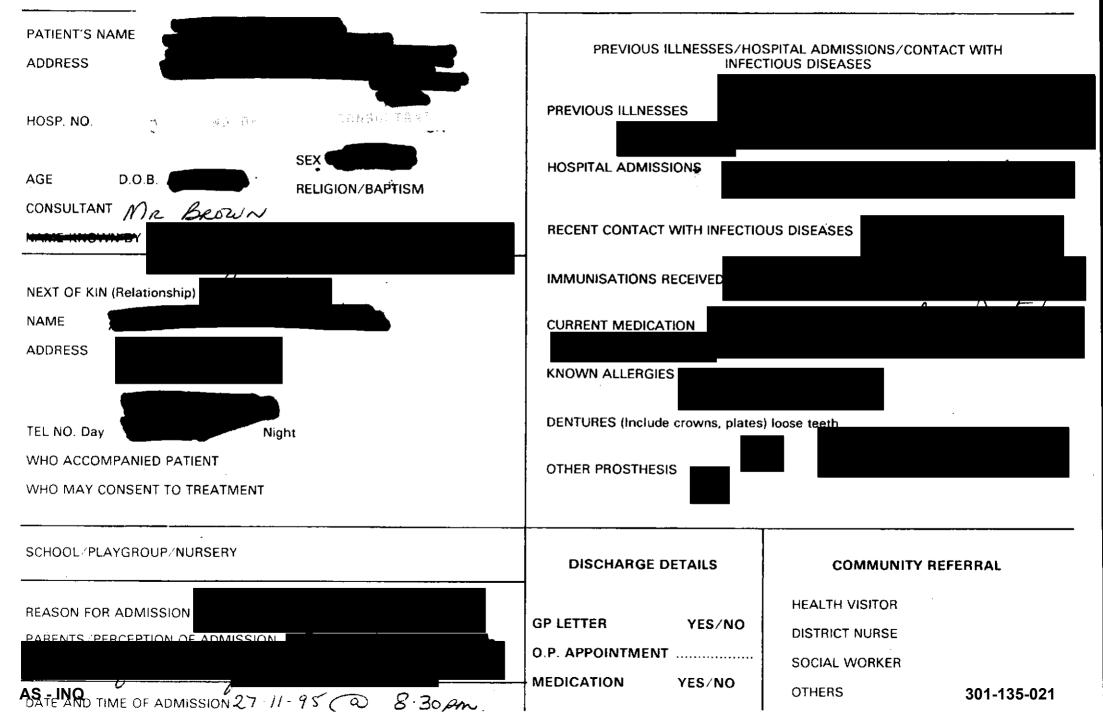
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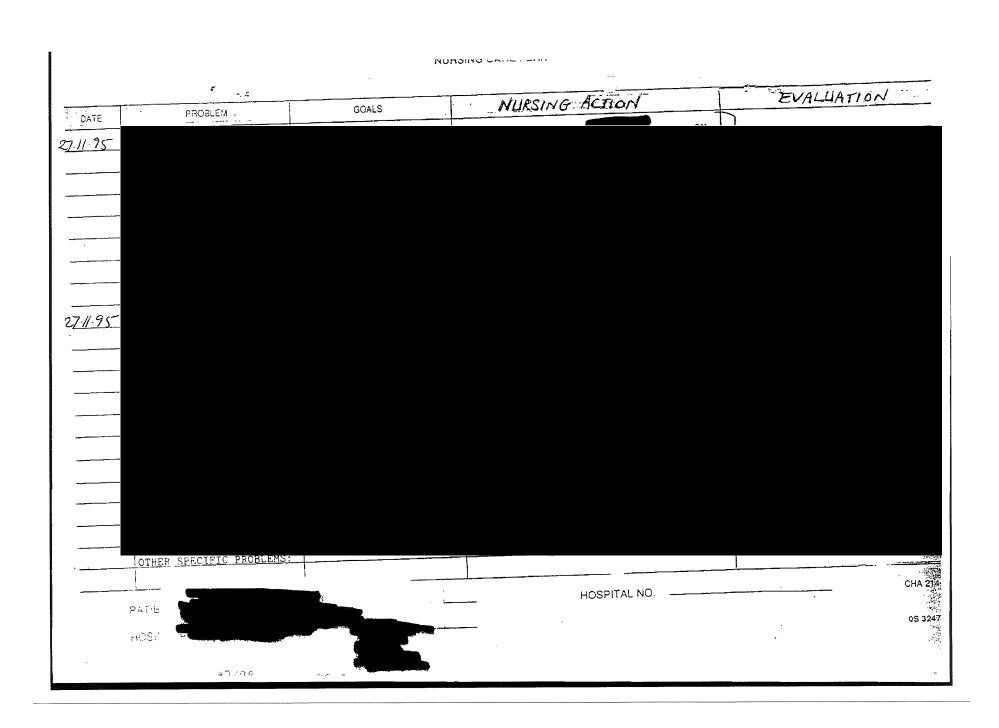
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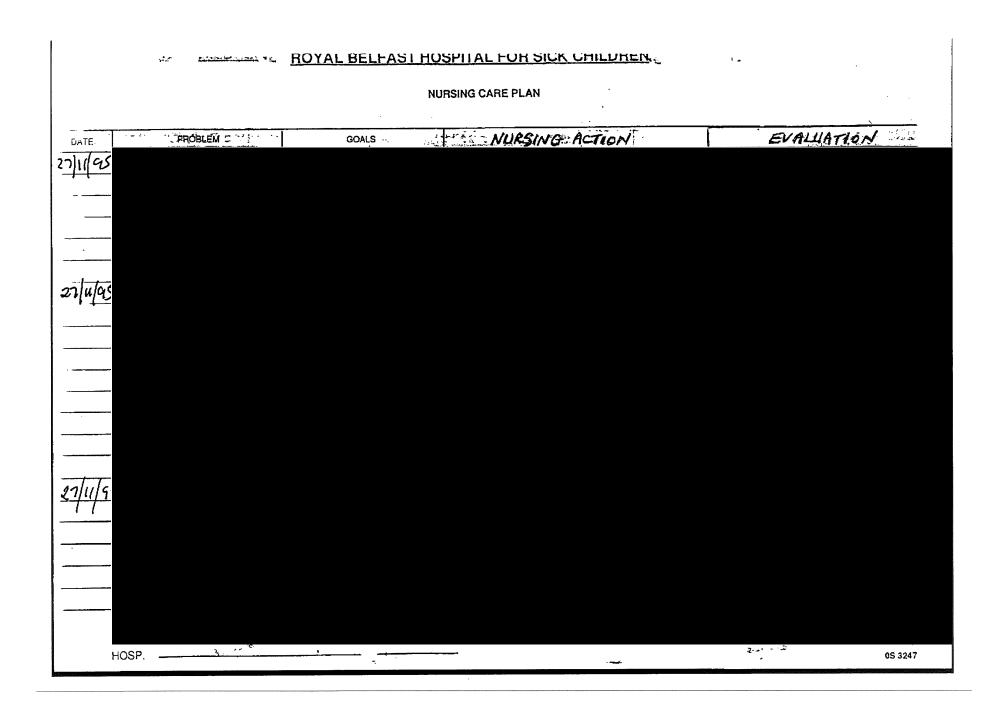


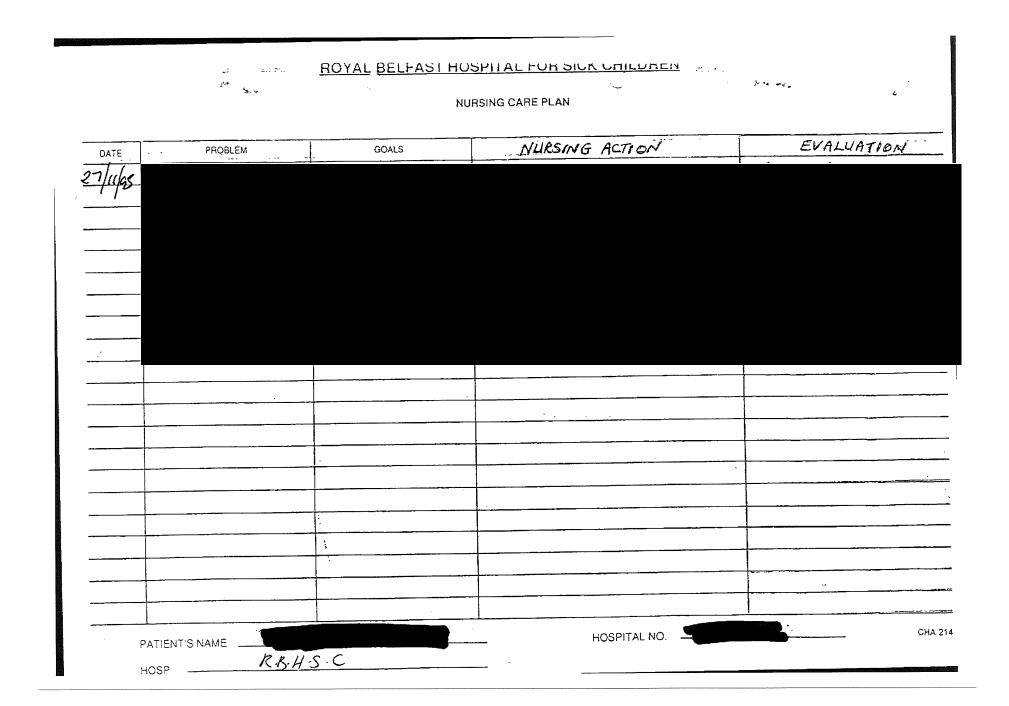


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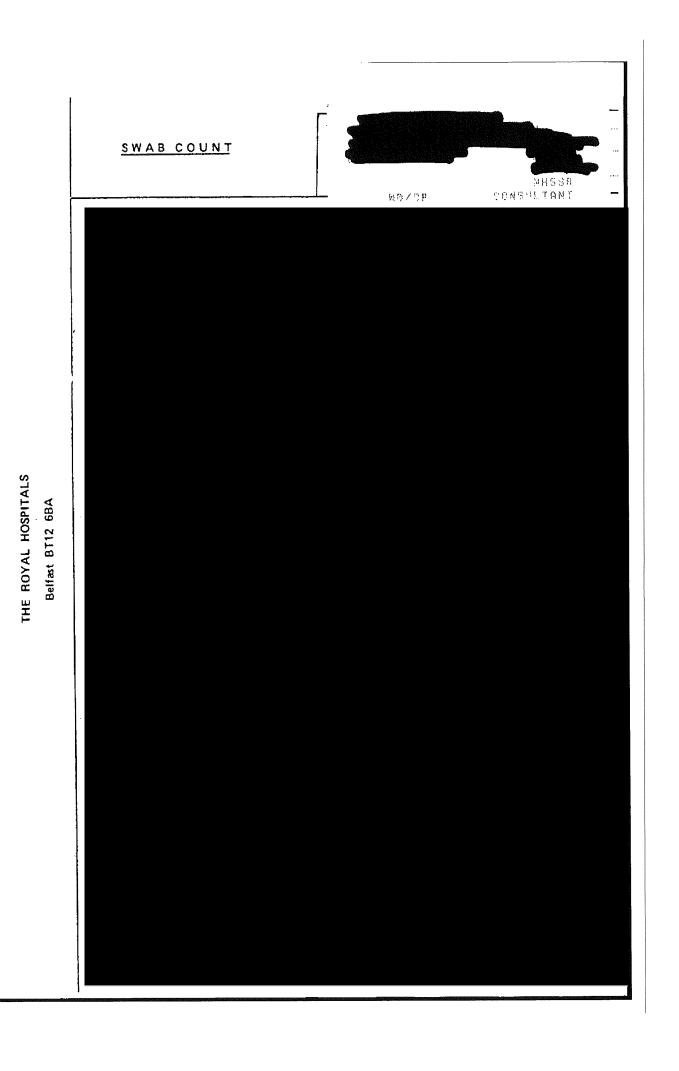


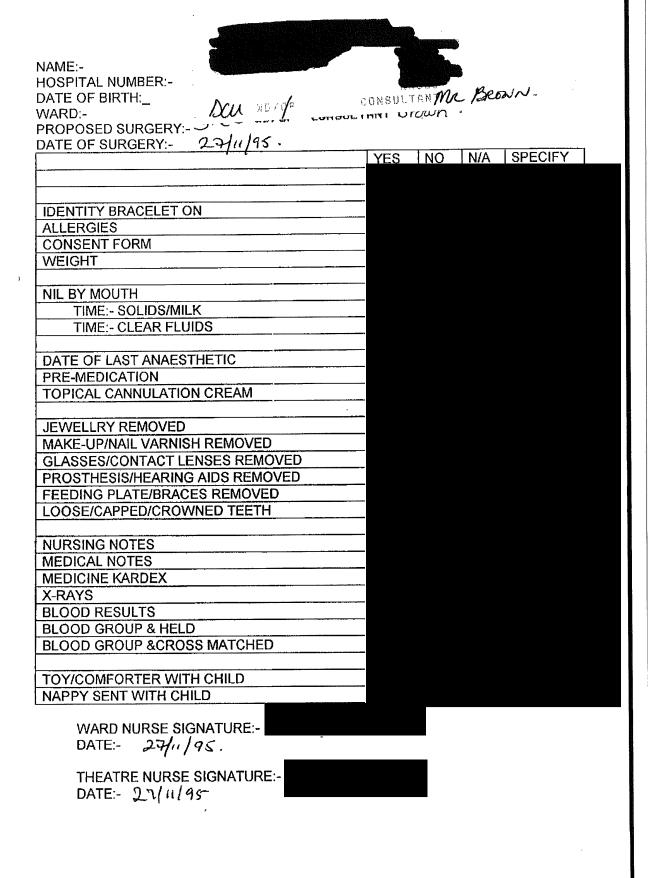






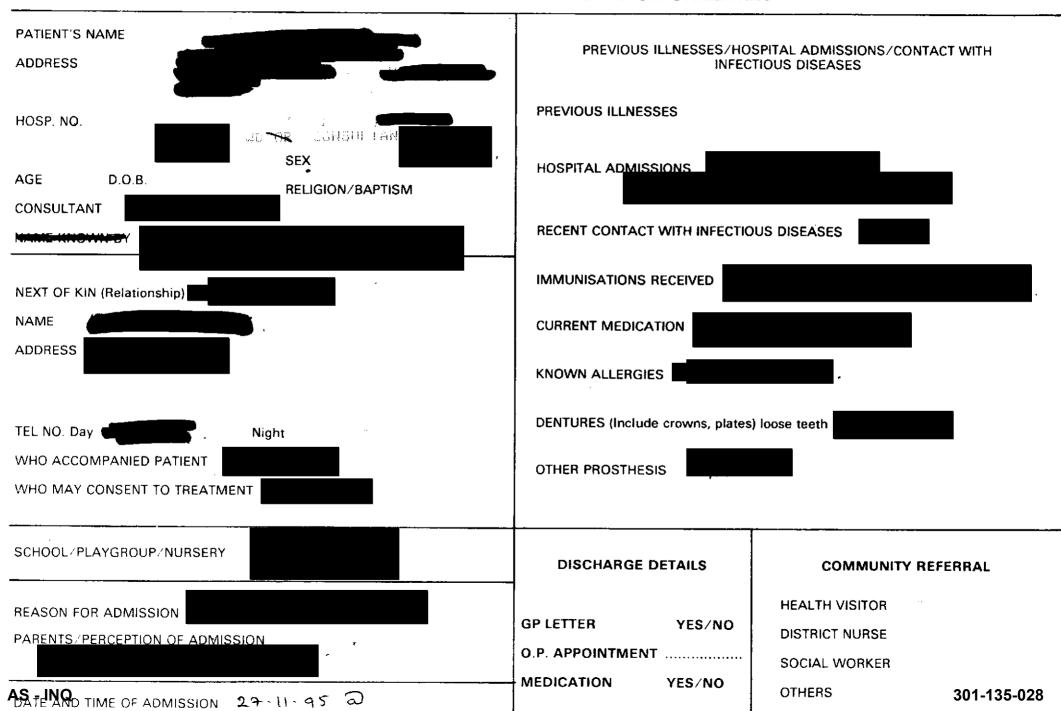
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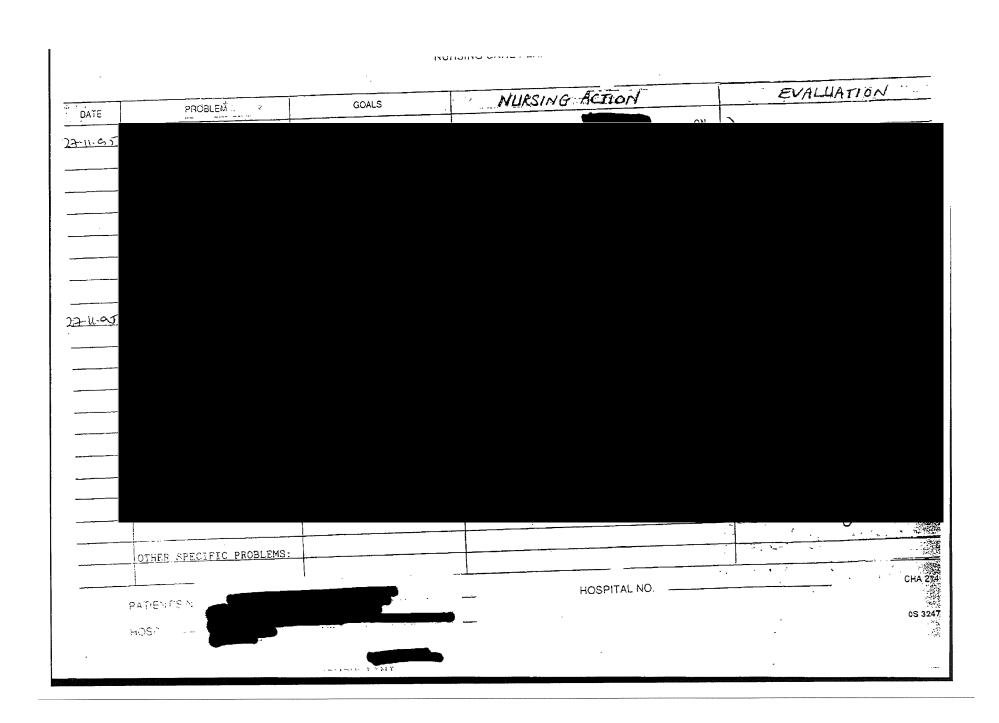


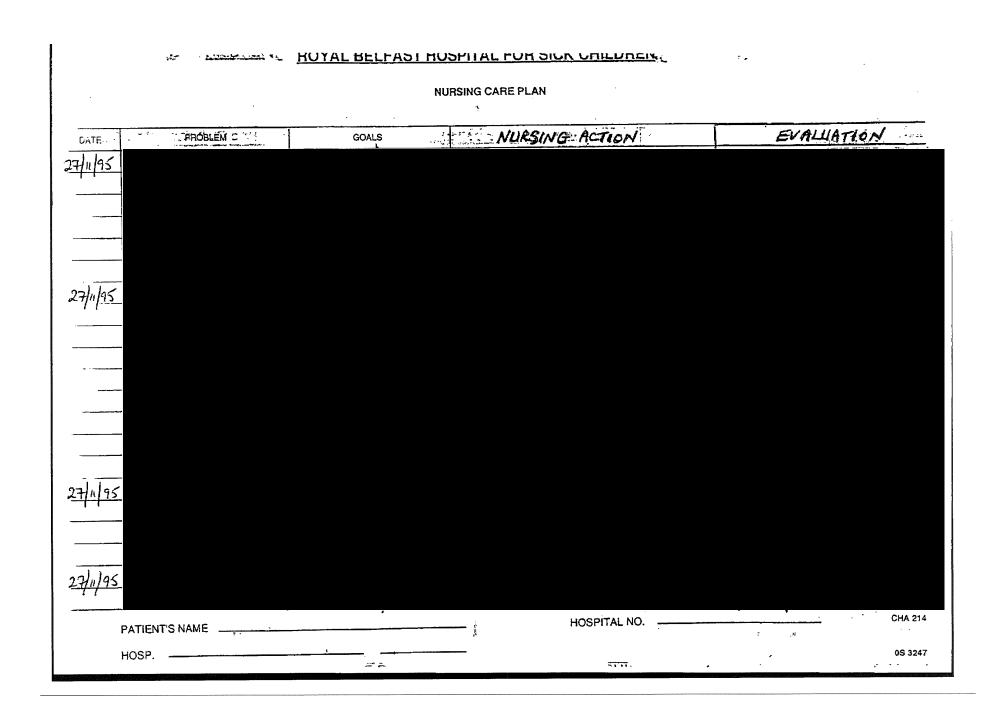


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#### **ROYAL BELFAST HOSPITAL FOR SICK CHILDREN**

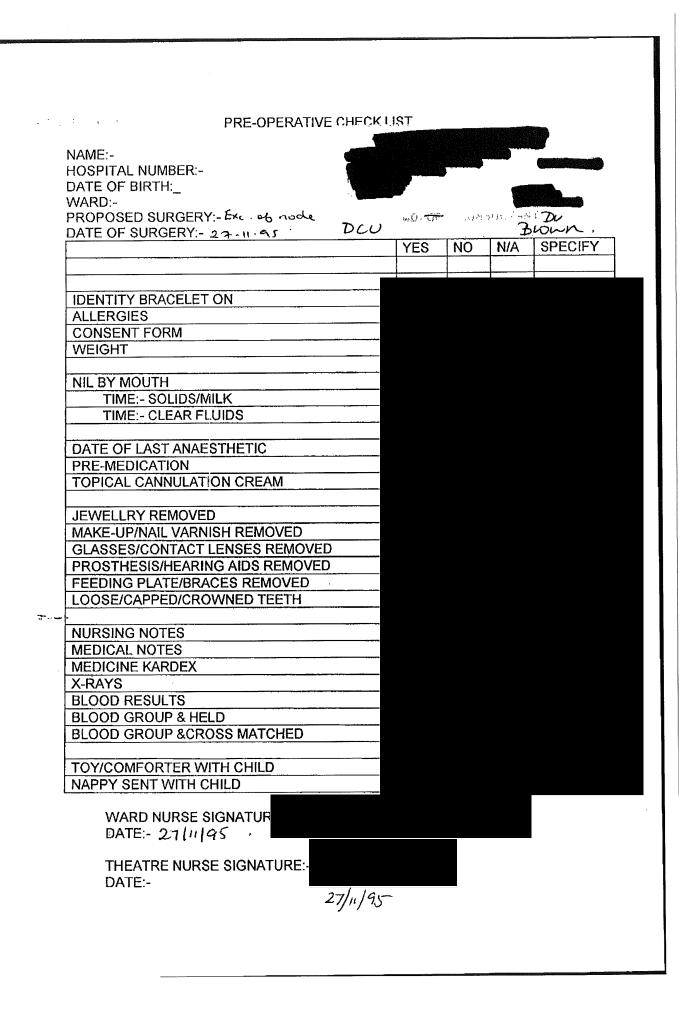


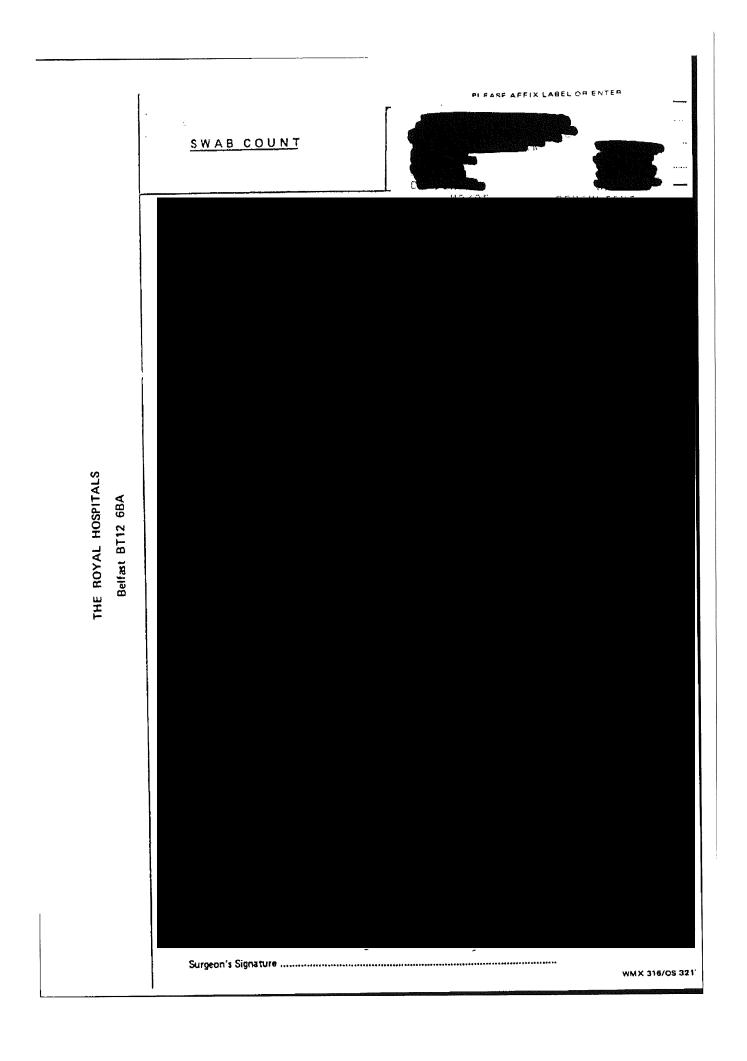




## ROYAL BELFAST HUSPITAL FUR SICK CHILDREN FILE NURSING CARE PLAN EVALUATION NURSING ACTION GOALS PROBLEM CHA 214 HOSPITAL NO. PATIENT'S NAME \_ HUSB

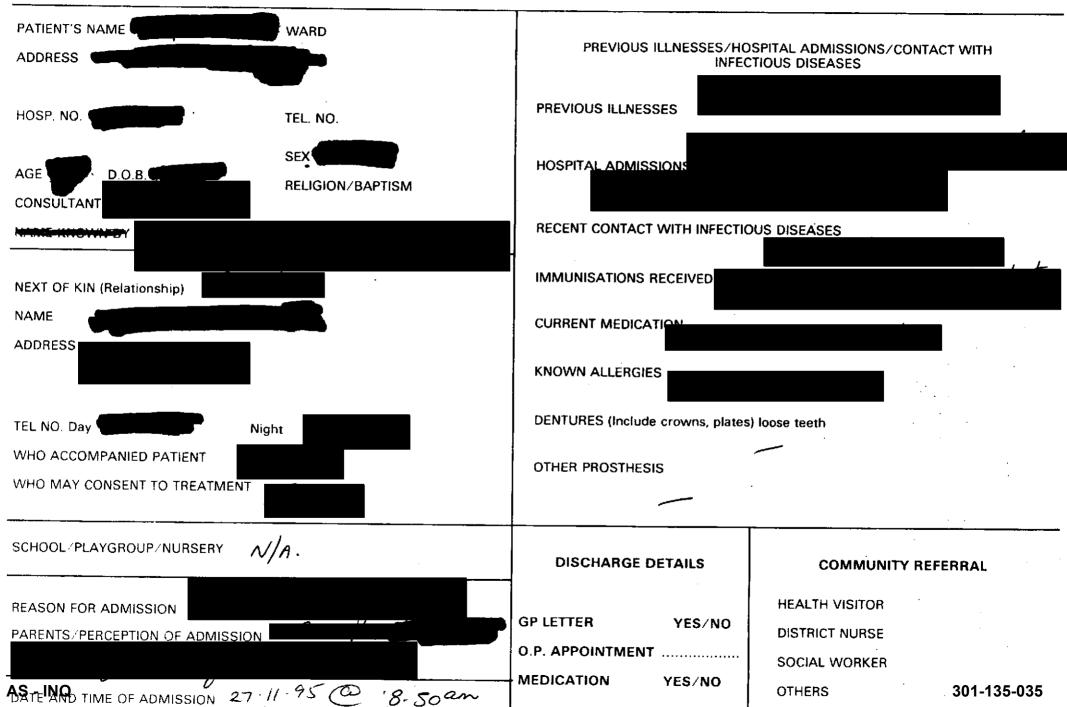
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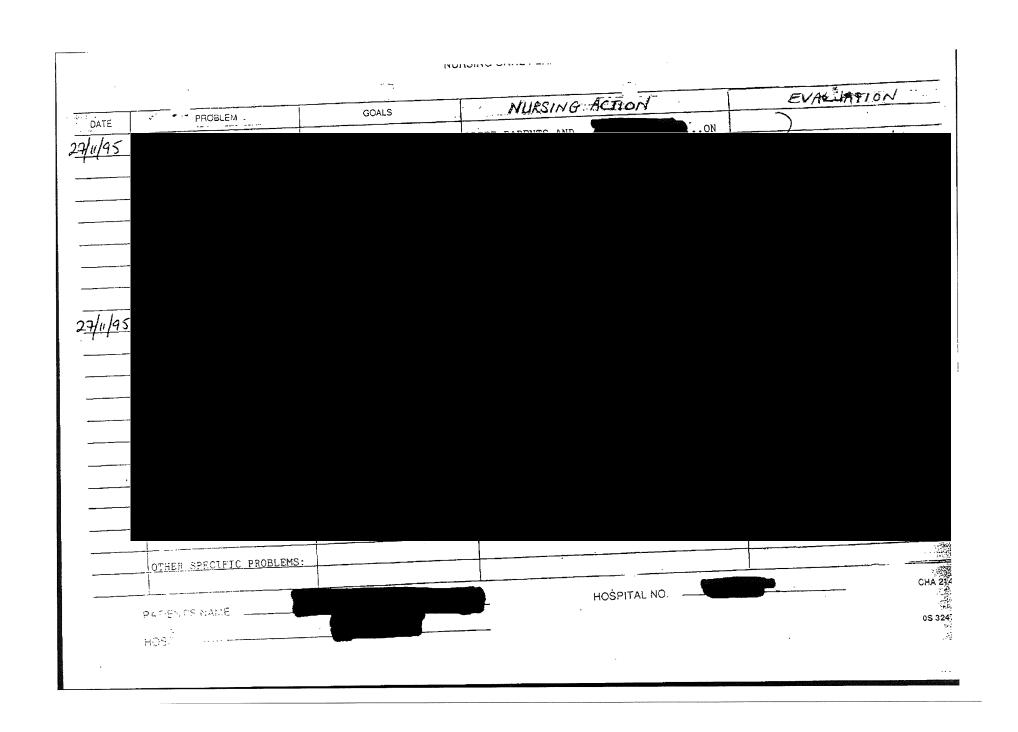


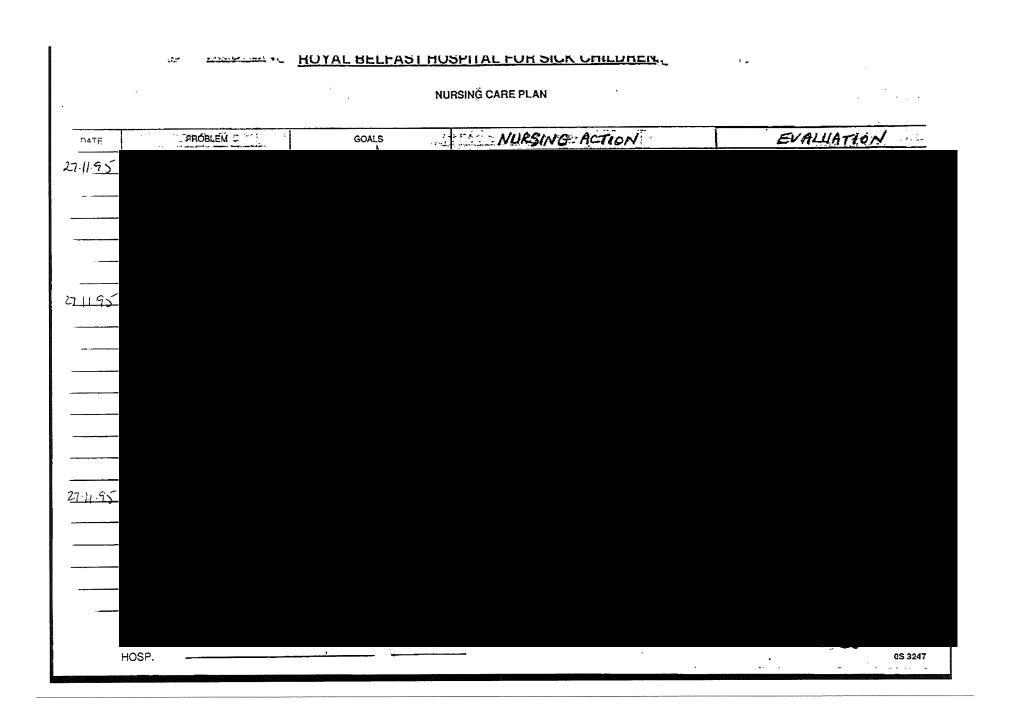


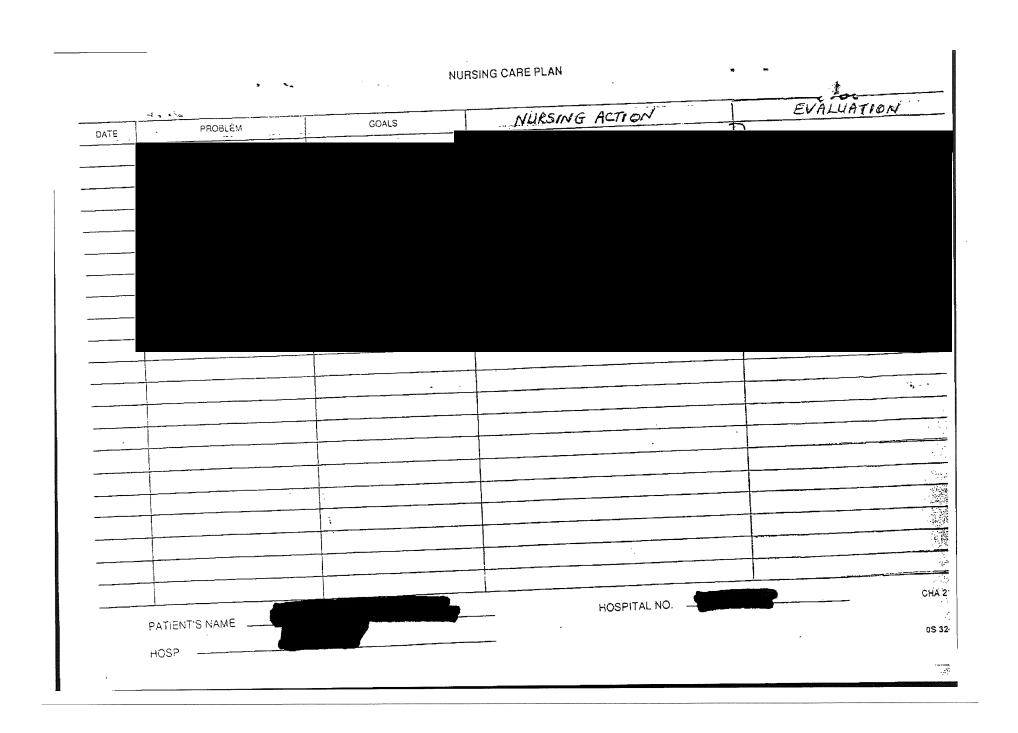
#### **ROYAL BELFAST HOSPITAL FOR SICK CHILDREN**



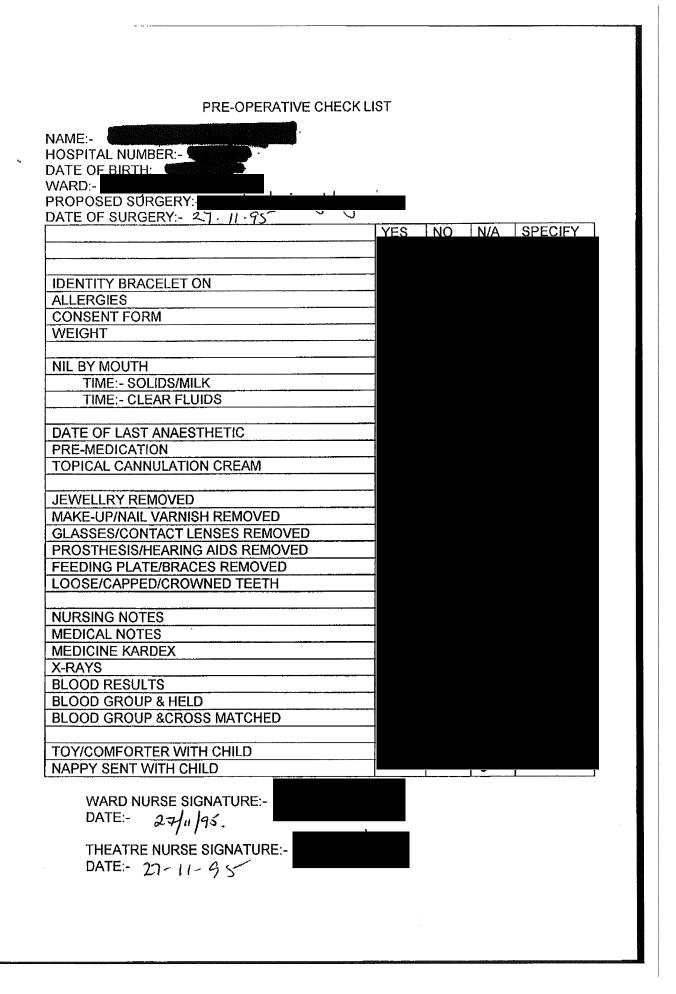


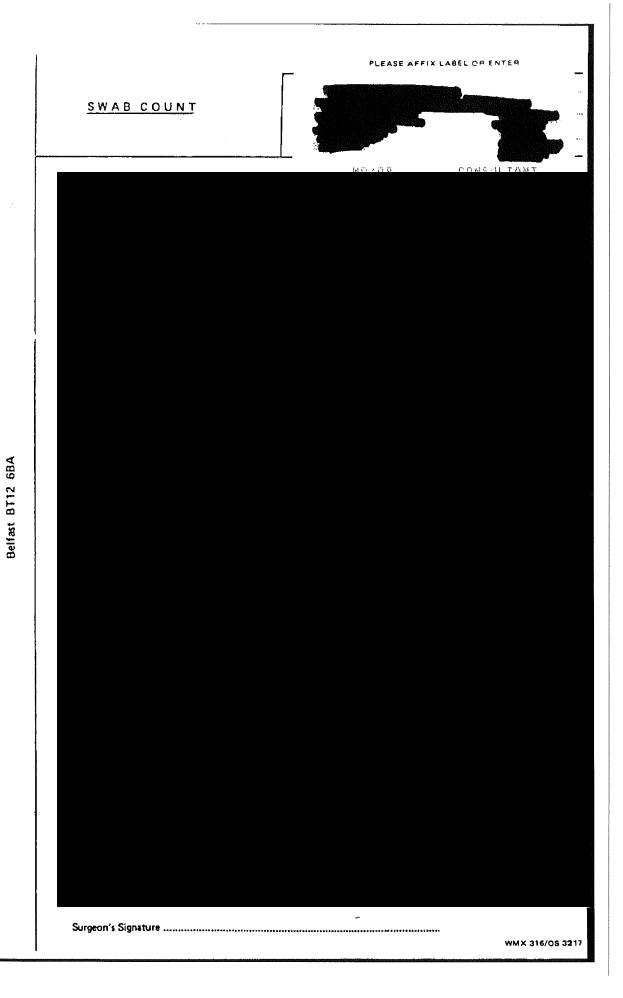






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