

The Inquiry into Hyponatraemia-related Deaths

Chairman: Mr John O'Hara QC

Ms Nicola Doohar
Legal Adviser
Directorate of Legal Services
2 Franklin Street
BELFAST
BT2 8DQ

Your Ref: NSCB04/1
NSCW50/1
NSCS071/1

Our Ref: BC-0040-11

Date: 21 July 2011

Dear Ms Doohar,

Re: Investigation into the deaths of Claire Roberts

Please see attached list of information required by the Inquiry.

I would appreciate a response by Friday 5th August 2011 .

Yours sincerely,



Bernie Conlon
Secretary to the Inquiry

Secretary: Bernie Conlon

Arthur House, 41 Arthur Street, Belfast, BT1 4GB

Email: inquiry@ihrdni.org **Website:** www.ihrdni.org **Tel:** 028 9044 6340 **Fax:** 028 9044 6341

DOCUMENTS REQUEST

1. All guidelines, procedures, protocols in RBHSC on the diagnosis and management of a child with a reduced level of consciousness or coma in October 1996 and to date.
2. All guidelines, procedures and protocols in RBHSC on differential diagnosis and what investigations ought to be taken to make a diagnosis in October 1996 and to date.
3. All guidelines, procedures and protocols in RBHSC in October 1996 and to date on:
 - monitoring fluid balance,
 - how to complete and record an accurate fluid balance chart including
 - how to record input and output on a fluid chart.
4. All guidelines, procedures and protocols on the administration of the first dose of IV drugs to a paediatric patient.
5. If midazolam was a controlled drug, a copy of the controlled drug record book for 21-23 October 1996 on Allen ward in RBHSC.
6. All the documents relating to all contact, communication and meetings with the Roberts in relation to Claire and including the minutes, notes and records of the 2 meetings held with the Roberts family in December 2004/January 2005; all emails relating to communication with the Roberts family.

B. FURTHER QUESTIONS FOR RBHSC

1. Identify those persons by name and job title in RBHSC or in RVH who were qualified and/or authorised to read and interpret paediatric EEG results in October 1996.
2. State whether there were neuropathologists available in RBHSC or in RVH in October 1996 to read and interpret paediatric EEG results.
3. State the availability of a CT scan for a paediatric patient in October 1996 in RBHSC/RVH both during office hours and also out of hours, and what arrangements were required to be made for a paediatric CT scan at that time both during and out of office hours.
4. Describe the availability of a MRI scan for a paediatric patient in October 1996 in RBHSC/RVH during office hours and also out of hours, and state what arrangements were required to be made for a paediatric MRI scan at that time at each of those times.
5. State whether Midazolam was a controlled drug on 22 October 1996 in RBHSC

6. State what type of nursing operated on Allen Ward between 21-23 October 1996, that is: named nursing, patient allocation nursing or team nursing.
7. Identify the persons who attended all meetings with the Roberts in relation to Claire and in particular the 2 meetings held with the Roberts family in December 2004/January 2005, and the reasons for the attendance of each of those persons. In particular state whether Dr. David Webb attended any of those meetings, and if so, state which meetings and the reasons for his attendance. If he did not attend, state the reasons why not. Furthermore, state whether any other neurologist was present at those meetings, and if so, identify that person, and if not, state why not.
8. State all instructions given to Prof Young in relation to his review and report, and provide a copy of those documents.
9. Explain whether Prof. Young provided you with a written report in relation to CR and furnish a copy thereof. If not, state why not.
10. Specify the basis upon which you selected Prof. Young as being properly qualified to review Claire's medical notes and comment on her treatment and care.
11. Specify the basis upon which you selected Prof. Young as being independent of RBHSC and RVH and capable of conducting an independent review and report.
12. State the reasons why Prof. Young provided Michael McBride with a verbal report only. Furnish all notes and records relating to that verbal report.
13. State the date when the Roberts family first contacted the RBHSC in 2004 and the person whom they contacted.
14. State the dates and nature of all contact and communication between the Roberts family and RBHSC from 2004 onwards and furnish all documents relating thereto.
15. State whether Dr David Webb provided night cover for paediatric patients in October 1996, and if so, what his rota was in 1996 for night cover, and state whether he did night cover on the evening of 22 October and the morning of 23 October 1996.
16. In October 1996 state whether nursing care was prescribed by doctors, nurses or both.