

The Inquiry into Hyponatraemia-related Deaths

Chairman: Mr John O'Hara QC

Ms Angela Crawford
Directorate of Legal Services
2 Franklin Street
BELFAST
BT2 8DQ

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

Our Ref: AD-0441-12

Date: 16th October 2012

Dear Ms Crawford,

Re: Claire Roberts

I refer you to the witness statement of Michael McBride (WS-269/1) and would be grateful if you could provide the following information:

- 1) At Q30, page 20 Mr McBride states, "*[f]rom the mid 1990's the Trust has employed CHKS a comparative healthcare intelligence company to provide benchmarking on a range of clinical measures of performance across all specialities*". Please provide the Inquiry with all information that your client holds in relation to CHKS from his appointment until October 1996.
- 2) At Q32(a), page 21 in relation to making any report regarding Claire Roberts, Mr McBride states, "*[g]iven the context of Mr Roberts' contacting the Trust and the level of public concern it would have been my practice to advise the Chief Executive and Chair particularly as Claire's death was subsequently referred to the Coroner*." Please provide the Inquiry with any notes or memoranda that were written by any of the above mentioned parties in relation to this.
- 3) At Q32(b), page 21 Mr McBride states, "*a serious Adverse Incident Report was forwarded to the Department in March 2006...in accordance with Departmental Circular HSS (PPM) 02/2006*." Please provide the Inquiry with this report and any correspondence relating to it.
- 4) At Q32(b), page 21 Mr McBride notes that, "*[i]t is my understanding that the former Eastern Health and Social Care Board was also informed at this time as was required under the guidance*." Please provide the Inquiry with any communication or further information in relation to this.

Secretary: Bernie Conlon

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I would be grateful if your client could provide this information to the Inquiry by 24th October 2012.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Dillon', written in a cursive style.

Anne Dillon
Solicitor to the Inquiry