

The Inquiry into Hyponatraemia-related Deaths

Chairman: Mr John O'Hara QC

Ms Wendy Beggs
Assistant Chief Legal Adviser
Directorate of Legal Services
2 Franklin Street
BELFAST
BT2 8DQ
dls [REDACTED]

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

Our Ref: CMcG-0010-11

Date: 02-June-2011

Dear Ms Beggs,

Re Investigation into the death of Adam Strain

Following a review of correspondence we do not appear to have received a response to letter dated 8th March 2011 Ref: AD-0237-11 (copy enclosed). I would be grateful for a response by return.

In relation to letter dated 7th July 2010 Ref AD-0148-10 (copy enclosed) and responded to by Belfast Health and Social Care Trust dated 30th July 2010 (copy enclosed), I would point out that the original request at bullet points 4 and 5 was seeking papers relating to:

- Any Post-graduate meetings (including clinical audit, case conferences, grand rounds) where the Adam Strain case was discussed.
- Any Anaesthetic team/division meetings where the Adam Strain case was discussed.

Even if it is not apparent that it is the Adam Strain case that was being discussed please provide the minutes of the relevant meetings. Point 5 of the response refers to a memorandum being drafted for use during Paediatric Surgery, can you please let me know to whom that memorandum was circulated.

I would appreciate a response by Friday 17th June 2011

Yours sincerely,



Clare Mc Givern
Solicitor to the Inquiry
Enc

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

Ms Wendy Beggs
Directorate of Legal Services
2 Franklin Street
BELFAST
BT2 8DQ

Your Ref: NSCB04/1

Our Ref: AD-0148-10

Date: 7th July 2010

Dear Ms Beggs,

Re Your Client(s): Belfast Health & Social Care Trust

Investigation into the death of Adam Strain

I refer to the above.

I would be grateful if you would forward me papers relating to the following, which should be in the possession of the Belfast Trust:

- Trust Board meetings from Nov 1995 to Dec 1996 (to include agendas and minutes).
- All Board subcommittee meetings held for the same period.
- Any Executive management meeting where the Adam Strain case was discussed.
- Any Post-graduate meetings (including clinical audit, case conferences, grand rounds,) where the Adam Strain case was discussed.
- Any Anaesthetic team/division meetings where the Adam Strain case was discussed.

I would be grateful if you would advise me if there was any sub-committee of the Board in existence in 1995 (or established thereafter) which dealt with issues relating to quality of patients' care.

While this request relates to the Inquiry's investigation of Adam Strain's death, I wish to put your client on notice that requests for similar papers will be made relating to the investigations of the deaths of Claire Roberts, Raychel Ferguson and Conor Mitchell.

Secretary: Raymond Little **Deputy 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

All papers should be tabbed and indexed and forwarded to the Inquiry Secretariat on or before the 30th July 2010.

Thank you for your assistance in this matter.

Yours sincerely,

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

Anne Dillon
Solicitor to the Inquiry



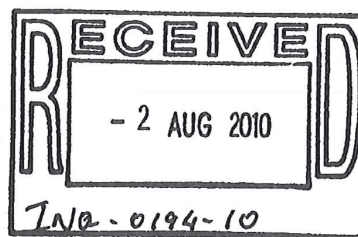
**Belfast Health and
Social Care Trust**

**Litigation Management Office
Royal Victoria Hospital**

Our Ref: A.49/04/33/Inquiry

30th July 2010

Ms Anne Dillon
Solicitor to the Inquiry
Inquiry into Hyponatraemia Related Deaths
Arthur House
41 Arthur Street
BELFAST
BT1 4GB



Dear Ms Dillon

Re: Inquiry into Hyponatraemia-related Deaths

The Trust's solicitor has forwarded your letter of 7th July 2010 for reply.

Bullet point 1

I enclose copies of Trust Board agendas and Minutes of monthly meetings for the period from November 1995 until December 1996 as requested.

Bullet points 2&3

All subcommittee Board meetings and Executive management meetings from November 1995 to December 1996 were minuted on the Hummingbird electronic record system and are now inaccessible. The Trust is investigating whether a licence can be raised to access these with the new IT systems.

Bullet point 4

All deaths in the RBHSC are discussed at the Paediatric Directorate Clinical Audit Meetings which are attended by paediatricians, paediatric surgeons and paediatric anaesthetists. The number of cases of mortality discussed is usually given in the Minutes but no names or clinical details are ever given.

Bullet point 5

Following the Inquest into the death of Adam Strain on 19th June 1996 the team of paediatric anaesthetists drafted a memorandum for use during paediatric surgery. (060-018-035,036)

Regarding the Boards' sub-committee dealing with issues relating to quality of patients' care, it will be necessary to await access to Hummingbird to identify when this was established.

Yours sincerely


A P Walby FRCS Ed
Clinical Director
Legal Services

Enc.

c.c. Ms Wendy Beggs

Litigation Management Office, 4th Floor, Bostock House, Royal Victoria Hospital, Belfast, BT12 6BE

Tel: [REDACTED] Fax: [REDACTED] E-mail: [REDACTED]

All papers should be tabbed and indexed and forwarded to the Inquiry Secretariat on or before the 30th July 2010.

Thank you for your assistance in this matter.

Yours sincerely,

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Anne Dillon
Solicitor to the Inquiry

The Inquiry into Hyponatraemia-related Deaths

Chairman: Mr John O'Hara QC

Ms Wendy Beggs
Directorate of Legal Services
2 Franklin Street
BELFAST
BT2 8DQ

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

Our Ref: AD-0237-11

Date: 8th March 2011

Dear Ms Beggs,

Re Investigation into the death of Adam Strain

I refer to the above and to your letter of 24th February 2011.

The response given therein to my request for a copy of a protocol concerning "monitoring, anaesthetic set-up and drug administration" was that "Dr Gibson will have been referring to her perception of clinical practice in RBHSC and not to any written document".

Dr Gibson in her report (reference 011-005-017) states:

"The Protocols for monitoring, anaesthetic set-up and drug administration in this area are among the best on the Royal Hospitals site."

Would you please confirm that despite this statement, it is your client's belief that the protocols to which Dr Gibson referred did not in fact exist in written form?

Would you advise me if Dr Gibson's witness statement request has been forwarded to her home address?

I am grateful for your assistance.

Yours sincerely,



Anne Dillon
Solicitor to the Inquiry

Secretary: Bernie Conlon

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

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