

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: HYP B04/1

Our Ref: BC-0073-11

Date: 22 November 2011

Dear Ms Beggs,

Re: Raychel Ferguson

We wrote to you on 25 October requesting a number of CVs I enclose a further copy of that correspondence for your information. We have no record of receiving a reply from you in response to this request. We now require your response as a matter of urgency.

We have now identified a number of further classes of documentation which are relevant to our investigations. We would be grateful if you could provide for us the following additional documents and save where otherwise stated, as applicable in June 2001:-

1. The surgical Rota for the period 6 June 2001 to 10 June 2001
2. The CV (or career history) for Mr. M.H. Zafar
3. Any written protocol or guideline applicable to pre and post operative IV fluids for paediatrics
4. Any policy relating to the making or maintenance of notes and records by clinical and nursing staff following their attendance with a patient
5. Any record of training or instruction provided to clinical and nursing staff regarding the making or maintenance of patient notes and records
6. Any guidance that was given to staff regarding post-operative vomiting both as applicable in June 2001 and now (2011)
7. Any guidance provided to staff which addressed issues surrounding the handover of patient care between clinical teams e.g. a handover of responsibility for care between the surgical and the paediatric teams

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

8. Any clinical governance policy which was disseminated to staff
9. Any policy or protocol now in place (2011) relating to the allocation of medical responsibility for surgical cases on paediatric wards
10. A copy of the Admission and Discharge policy for children at the hospital in 2001
11. Any written protocol or guideline to advise junior medical staff of the process to escalate clinical concerns on patients to more senior doctors
12. Any written protocol or guideline to advise on clinical handover of patients from one shift to the next
13. Any written protocol or guideline outlining the responsibilities of doctors in grades from pre-registration House Officers to Consultants
14. The minutes or notes of the following meetings between January 2001 and December 2002
 - a. Trust
 - b. Board
 - c. Clinical Governance or similar
 - d. Clinical Directorate or similar in surgery and children's services

We look forward to hearing from you as soon as possible.

Yours sincerely,



Bernie Conlon
Secretary to 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: NSCW50/1

Our Ref: CM-0053-11

Date: 25th October 2011

Dear Ms Beggs,

Re: Investigation into the death of Raychel Ferguson

Your Client: Western Health & Social Care Trust

I refer to the above and request a copy of the Curriculum Vitae for the following doctors as of 10th June 2001:

Dr Vijay Kumar Gund
Mr Regai Reda Makar
Dr Michael Curran
Dr Joe Devlin

A copy of this documentation is required to be furnished to the Inquiry by Tuesday 15th November 2011.

Yours sincerely,



Caroline Martin
Solicitor to the Inquiry

Secretary: Bernie Conlon
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