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-0492-13

Date: 10th January 2013

Dear Ms Crawford,

Re: Raychel Ferguson Clinical

I refer to the above and ask for your assistance with the following matters:

1. I anticipate that at the public hearings issues will arise which may require an understanding of various physical locations within Ward 6. Therefore, we would ask you to clarify with your client whether the physical environment of Ward 6 in Altnagelvin Hospital is broadly the same today as it was in June 2001.

If the same lay out does pertain I ask you to arrange for your client to produce for the Inquiry photographs of all relevant locations such as Room I (where Raychel was nursed), the nursing station, Sister Millar's office and the treatment room where Raychel was managed after her seizure. So far as possible the photographs might usefully be taken in a way which depicts the relationship of these locations with each other.

Furthermore, I ask you to obtain from your client's Estates Department (or equivalent) a copy of a plan drawing of Ward 6 as it existed in June 2001 depicting the above mentioned locations. If same is not available please direct a member of Altnagelvin staff with knowledge of Ward 6 to depict these locations on a simple plan drawing.

2. Please produce the nursing rotas applicable to Ward 6 in respect of the period 7-9 June 2001.

Furthermore, if nursing staff made a written record in order to sign off on the precise time when they left the Ward to go off duty this document should be produced also.

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

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- 3. In his witness statement (WS-033/2) at page 8 Dr. Gareth Allen explained that as part of a Continuing Professional Development course which he attended in 2012 a talk was provided by a consultant from Altnagelvin Hospital which addressed the following:
 - (a) Fluid Management in Children; and
 - (b) The ongoing public inquiry.

Please seek instructions from Dr. Allen and/or the Altnagelvin Hospital in answer to the following matters:

- (i) Which consultant from Altnagelvin provided this talk?
- (ii) Was a lecture pack or any other documentation distributed at this talk? If so, please obtain a copy for the Inquiry.

I would be grateful if you would address these matters with some urgency and provide a substantive response no later than Friday 18th January 2013. I am obliged for your help.

Yours sincerely,

Anne Dillon

Solicitor to the Inquiry