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-0510-13

Date: 31st January 2013

Dear Ms Beggs,

Re: Raychel Ferguson - Clinical

I refer to the above and to the recent statement dated 29 January 2013 submitted by Mr. Gilliland.

I would ask you to address the following matters with Mr. Gilliland (I have used the paragraph numbers cited by him). In addition there is one issue relating to urine microscopy which might usefully be addressed with the Western Trust.

1. Under 5.3 (ii)

Mr. Gilliland refers to advice from the "Up to date" website. It appears that he then sets out a quotation from an entry which may appear on that website. I would be grateful if he would furnish to the Inquiry (in documentary form) the advice which appears on this website, and if he could say something more to explain the status of this website.

Furthermore, if Mr. Gilliland wishes to rely on any report, article or advice relating to the practice surrounding the use of analgesia in 2001 he should forward this to the Inquiry.

This point is also of general application, so that if Mr. Gilliland wishes to support any of the points which he is making in his statement by reference to any material that explains the practice at or about the time Raychel was treated in 2001, he should now do so.

2. Under 5.3 (v)

Mr. Gilliland states that he believes "it is highly likely that I would have been informed on the morning of the 8 June that a child had been admitted overnight who had undergone a standard appendicectomy for appendictis."

Mr. Gilliland should be asked to fully explain the basis for this belief.

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RF - INQ 316-053-001

3. Under 7.2 Comment

Mr. Gilliland has acknowledged that he did not see Raychel post-operatively. He also states that he thinks it "highly likely that post-take ward round was conducted by [him] on the morning of the 8th as would have been [his] usual practice."

Was it Mr Gilliland's usual practice to exclude patients from his ward round?

4. Under 12.7

Mr. Gilliland takes issue with Mr. Foster in relation to whether Mr. Bhalla should have made a clinical note. Mr. Bhalla says that he examined Raychel [Ref: 095-017-075] when he went to Ward 6 sometime after 05:00 on the 9 June, and made certain arrangements for her further care.

Mr. Gilliland should clarify whether, given the nature of the examination performed by Mr. Bhalla and the steps that he then took, he would have expected him to have made an entry in the clinical notes.

5. Under 23.2

Mr. Gilliland addresses the issue of microscopy. He says that he is not sure that microscopy results would have been readily available in Althagelvin in 2001, out of hours.

You are asked to take instructions from your client to confirm whether urine microscopy was available out of hours in 2001, and how quickly results from a urine microscopic examination could have been made available to a clinician?

6. Under 6.5

Mr. Gilliland has stated (presumably referring to Mr. Zafar) that, "The advice given was to commence the oral fluids and step down the IV fluids if all was well."

Mr. Gilliland should clarify whether he is referring to a particular piece of evidence from Mr. Zafar (or others) setting out this advice, and if so, he should provide the relevant citation.

If, however, he is seeking to interpret what has been said by others, then he should say so.

I would be grateful for your earliest response.

Yours sincerely

Anne Dillon

Solicitor to the Inquiry

RF - INQ 316-053-002