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

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

Our Ref: BMcL-0059-13

Date: 11th March 2013

Dear Ms Crawford,

RAYCHEL FERGUSON (PRELIMINARY) - FURTHER QUERIES FOR BELFAST TRUST

I refer to previous correspondence and thank you and your client for your various responses to my requests for information and documents. Please take instructions from your client the Belfast Trust in relation to the following matters, and furnish the information/documents requested to the Inquiry.

1. I refer to Wendy Beggs' letter of 26 October 2011 enclosing the RBHSC "Paediatric Medical Guidelines" of May 1997 and the third edition thereof published in 2003 entitled "Managing Medical Problems in Children", and advising that a second edition was produced but "*is no longer available*". I cannot trace a reply to Ms Conlon's follow up letter of 28 November 2011 (BC-0079-11) nor to Mr Cullen's letter of 27 January 2012 (BPC-0116-12). It is now of considerable importance to the Inquiry's consideration of Raychel Ferguson (Preliminary) to see the second edition to establish
a) When that edition was published;
b) What guidance that edition contained concerning fluid management and the treatment of dehydration in children.

The Inquiry seeks your urgent assistance in establishing these matters. The Inquiry notes that the first and third editions were compiled inter alia by Drs Mary Claire McGivern and Moira Stewart with contributions from numerous named clinicians and it may well be that one of these individual compilers or contributors, or your client's library service, would be able to provide a copy of the second edition. Please take your client's further instructions on this very important matter.

2. Please also take your client's instructions as to who would have received copies of the first and second editions. Were they circulated solely within the RBHSC and if so to whom? Or were they circulated more widely for example to Paediatric departments in other hospitals/Trusts. Please confirm the position regarding circulation.

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3. The Inquiry understands from Dr Robert Taylor that there was a PICU database that was used for clinical audit and that data was entered on an ad hoc basis by clinicians and the PICU secretary. Please provide a copy of any material held on that database in relation to Lucy Crawford.

4. Your letter of 15 November 2012 (ref HYP B02/1) enclosed PICU coding form in respect of Lucy Crawford (copy attached for ease of reference). Can you confirm please if this form was for use in connection with the PAS system of coding.

5. Your letter of 26 March 2012 (your ref HYP B04/1) attached inter alia, the codings which were applied in the case of Lucy Crawford (copy attached for ease of reference). Please explain why codes for clinical conditions identified in the coding form referred to at 2 above, (including in particular hyponatraemia), were not applied in her case.

6. I refer to your letter of 15 November 2012 (your ref HYP B02/1) dealing with whether or not a discharge letter was issued, in which you indicate that there is a possibility that a discharge letter was written but misfiled, and it is also possible that no discharge letter was ever issued. This is not a satisfactory response. Please take your client's further instructions. If it is your client's position that a discharge letter may have been issued but misfiled, it should be possible for your client to clarify the position with the recipients of any such letter. Please take your client's clear instructions as to whether a discharge letter in the case of Lucy Crawford was ever issued. If it is your client's position that such letter was issued but misfiled, please identify the author of such letter, as the Inquiry will wish to obtain a statement from this individual.

7. Thank you for your letter of 1 February 2013 (your ref HYP B002/1 enclosing counterfoil to the MCCD. We note that Panel A "Further information offered" is completed "Yes". Please confirm whether or not further information was provided in relation to the MCCD of Lucy Crawford and if so, please identify the clinician who provided the information and provide a copy of such further information.

8. At point 8 of my letter of 6 November 2012 I asked for any Royal Trust /RBHSC guidance for doctors in existence in 2000 on the referral of cases to the Coroner and the information to be provided to the Coroner in making such referrals. In your reply dated 14 December 2012 you refer to paragraph 1b of your earlier letter of 10 January 2011 enclosing a booklet produced by the Coroners Service. The Inquiry understands that this booklet was first produced in 2008. So it would not have been available to Royal Trust/RBHSC clinicians in 2000. Can you please address the question as to *guidance in existence in 2000* for doctors in Royal Trust /RBHSC on the referral of cases to the coroner and the information to be provided to the coroner in making such referrals.

9. In your letter of 3 January 2013 you advise that your client's Audit Department "*have no documentation relating to August 2000 touching upon the mortality section of audit meetings*" but that the Trust has asked the Directorate to check if it has any documents at a local level. Arising from this , please seek your client's instructions as to whether your client has, or has had, any documentation whatsoever regarding clinical audit, whether in the form of guidance, policy, process, or protocols, in existence in 2000. It is clear from the evidence of individual clinicians that there was a system of clinical audit of mortalities in existence in the RBHSC in 2000, and the Inquiry would be very surprised indeed if that system was not underpinned by some such guidance, policy, process, or protocols. Please take further instructions on this point. Please also confirm the outcome of the Directorate inquiry as to documents at a local level.

10. I await responses to my letters of 9 January 2013 (BMcL-0044-13), and 28 February 2013 (BMcL-0056-13) and Ms Dillon's letter of 8 January (AD-490-13).

I look forward to hearing from you in relation to the above matters

Yours sincerely,

Brian McLoughlin
Assistant Solicitor to the Inquiry