

# The Inquiry into Hyponatraemia-related Deaths

Chairman: Mr John O'Hara QC

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

Your Ref: NSCB04/1  
NCSW50/1

Our Ref: AD-0543-13

Date: 15<sup>th</sup> March 2013

Dear Ms Beggs,

**Re: Raychel Ferguson - Governance**

I refer to the above.

I would be grateful to receive the undernoted documentation/files pertaining to the case of Raychel Ferguson:

1. Litigation Management Office files;
2. Clinical Negligence/Litigation files
3. Brangam & Bagnall/ solicitor files;
4. Media/Corporate Affairs/PR files;
5. Investigation/Review files;
6. Neuropathology/ Pathology files;
7. Inquest files
8. Complaints files;
9. Emergency Planning Co-Ordination Unit (EPCU), in particular in relation to Raychel Ferguson and the UTV Broadcast
10. Audit reports, minutes and papers held by the Audit Co-Ordinator;
11. Minutes of Board Meetings, committee meetings and Critical Incident meetings (to include the Medical Records and Audit Committees);
12. Any and all documentation relating to:

**Secretary:** Bernie Conlon

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- (a) The transfer of patients and information between hospitals (and particularly between Altnagelvin and the Royal Group Hospitals Trust- "RGHT");
- (b) Consideration of and liaison in relation to the UTV documentary;
- (c) Communication/correspondence between the RGHT and Altnagelvin;
- (d) Nursing notes/communication;
- (e) Medical Director's meetings with the CMO, Health Board Officials or otherwise;
- (f) Communication/correspondence between the RGHT and Altnagelvin in relation to Dr. Taylor's chart of the 'Incidence of Hyponatraemia' for the Hyponatraemia Working Group (to include details of how such information was relayed to Altnagelvin);
- (g) Communication/correspondence/discussion as and between staff in Altnagelvin and the RGHT;
- (h) Communication/correspondence as and between RGHT staff and the Coroner;
- (i) Reporting to the National Confidential Enquiry into Patient Outcome and Death;
- (j) The "yellow card" report by Dr. Taylor to the Committee for Safety of Medicines.

Should your client wish to assert a claim for privilege in respect of any of the documents in the above files, I ask that such application is made at the time of submission of the file indices and documents. I would be grateful if this could be done by Friday 5<sup>th</sup> April 2013.

Yours sincerely,



Anne Dillon  
Solicitor to the Inquiry