

The Inquiry into Hyponatraemia-related Deaths

Chairman: Mr John O'Hara QC

Ms Joanna Bolton
Directorate of Legal Services
2 Franklin Street
BELFAST
BT2 8DQ

Your Ref: NSCB04/1
NCSW50/1

Our Ref: AD-0604-13

Date: 1st July 2013

Dear Ms Bolton,

Re: Raychel Ferguson Governance

I refer to the above.

I enclose for your attention a schedule of information requests. I would be grateful to receive your clients' responses on or before Wednesday 17th July 2013.

Thank you for your assistance.

Yours sincerely,



Anne Dillon
Solicitor to the Inquiry
Enc

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

1	Please provide the Inquiry with a breakdown of the monthly figures for the use of Solution 18 (by volume, bag or other relevant measurement) in the Craigavon Hospital between January 2000 and July 2001	
2	Ref: 316-006o-004 - At Para 6 reference is made to a paper on <i>"Service Developments"</i>	Please forward paper.
3	Ref: 021-036-079 – Memorandum (from Dr Nesbitt to Dr Moles) – In this memo reference is made to <i>"the recent Clinical Incident Meeting"</i> at which the use of No 18 Solution was discussed.	If such a meeting is different from the meeting held on 12 th June 2001 – Ref: 316-006g, can you please forward the minutes/notes/records of this meeting. If no such minutes exist we would also like the clinical incident report.
4	Ref: 023-046-108- In this response Dr Nesbitt says <i>"the Working Group only considered the case of Raychel Ferguson"</i> -	Please confirm that we have all papers relating to this Working Group to be identified using Inquiry references. If unable to please forward.
5	We have received a copy of the Service Agreement for 1999/2000- 2001/2002 in your letter to us dated 19 th April 2013.	<p>Please forward a number of documents referred to in it, namely:</p> <ul style="list-style-type: none"> • Para 13.2 - <i>"regular monitoring reports on quality initiatives to the Purchaser"</i> • Para 14.2 - <i>"details of its quality framework with the Purchaser"</i> • Para 15. 2 - <i>"Hospital's written discharge procedure"</i> • Para 6.1 Appendix 1- <i>"Purchasers own charter document- Better Care"</i> <p>Para 7.1 Appendix 1- <i>"written complaints procedure"</i></p>
6	In his PSNI Statement Dr Nesbitt refers to a conversation he had with two Neurosurgeons in RBHSC (Ref: 095-010-031).	Please identify the two Neurosurgeons
7	Please provide monthly figures for the use of Solution 18 (i e. by volume or bag) in the Children's ward of Altnagelvin between Jan 2000- Dec2002	
8	Ref: 316-006g-005 – Reference is made to minutes of a meeting at which it is suggested by Mrs. Burnside that a review be undertaken into the organisational structures of the Altnagelvin hospital in 2001.	Please forward all relevant documentation in relation to this
9	In your letter dated 25 th June 2013 enclosing The Accountable Officer memorandum for Mrs. Burnside, refers at paragraph 6 to <i>"guidance issued inter alia to the management of standards of patient care"</i> .	Please forward this guidance.

RBHSC

10	In your letter dated 14 th June 2013, you confirmed that Mrs Pauline Webb acted as Patient Liaison Manager, at the time of Raychel's death, for the Royal Hospital's Trust. Please confirm that Mrs Webb does not hold any papers relating to Raychel Ferguson other than the letter of claim that you refer to in your letter dated 14 th June 2013. In the event that she does hold any relevant papers please forward to the Inquiry within 10 days.
11	Please provide monthly figures for the use of Hartman's solution (i.e.) by volume or bag) in the Children's Hospital between Jan 2000- Dec 2002