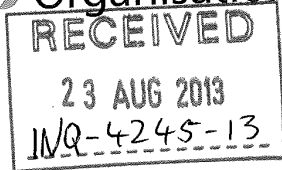




Business Services
Organisation



Directorate of Legal Services

PRACTITIONERS IN LAW TO THE
HEALTH & SOCIAL CARE SECTOR

2 Franklin Street, Belfast, BT2 8DQ
DX 2842 NR Belfast 3

Your Ref:

Our Ref:
HYP B04/05

Date:
23rd August 2013

Mrs Bernie Conlon
Secretary to the Inquiry
Inquiry into Hyponatraemia Related deaths
Arthur House
41 Arthur Street
Belfast
BT1 4GB

Dear Madam,

RE: INQUIRY INTO HYPONATRAEMIA RELATED DEATHS – RAYCHEL FERGUSON GOVERNANCE – BELFAST TRUST

I refer to the above matter and your email of 20th August 2013 enclosing the opening statement to be delivered by Senior Counsel on Tuesday 27th August.

The Belfast Trust has asked that we clarify the following issues with you.

Paragraph 213 states that *"Dr. Nesbitt conducted a telephone survey, probably on 13th June 2001, of other hospitals in Northern Ireland to enquire as to post-operative fluid management practice"*. Please note that the letter from Dr Nesbitt to Dr Fulton dated 14th June 2001(022-102-317) (reference 601) states that Dr Nesbitt *"contacted several hospitals including the Royal Hospital for Sick Children and made enquiries about peri-operative fluid management"* [emphasis added]. He goes on to say that the RBHSC *"Anaesthetists have recently changed their practice and have moved away from No 18 Solution.....to Hartmann's solution"*. We are instructed that the change of practice most likely refers to intra-operative fluids prescribed by Anaesthetists and not post-operative fluids because Hartmann's solution was not routinely prescribed post-operatively in the RBHSC. Furthermore I would ask that you note that the only reference to post-operative fluids is made in respect of Craigavon Hospital and the Ulster Hospital.

Paragraph 306 - *"It is not known whether the necessary report of her death was made to NCEPOD."* Please provide a copy of the relevant NCEPOD documentation which confirms that a report was *"necessary"*. Furthermore I note that only the correspondence from the Western Trust (321-004g-003) on this matter has been referenced in the opening statement. This matter was also raised with the Belfast Trust. Please refer to document 321-030-001 for the

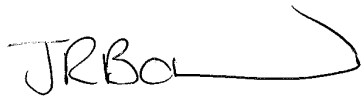
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Belfast Trust's response. In the circumstances I would ask that a reference to this correspondence is also included in paragraph 306 of the opening.

I await hearing from you.

Yours faithfully

A handwritten signature in black ink, appearing to read 'JR Bolton', followed by a long horizontal line that curves upwards at the end.

Joanna Bolton
Solicitor Consultant