A STATE OF THE STA	and a shift of the should be a	AND THE PROPERTY OF THE PROPER	Epinemportunisti antiata antia
		Witness Statement Ref. No.	138/4
NAME OF CE	IILD: Claire R	oberts	
Name: David	Webb	484-440-440-440-440-440-440-440-440-440-	
Title: Dr.			
Present positi	on and instituti	on:	
Consultant Pa	ediatric Neurol	ogist- Our Lady's Hospital, Dublin, Ireland	
National Chil	dren's Hospital,	, Tallaght, Dublin, Ireland	
	tion and institut of the child's death		A MANAGEMENT OF THE PROPERTY O
	•	gist-RoyalBelfastHospital for Sick Children ("RBHS	6C")
Membership	of Advisory Par e and title all of th	nels and Committees: nose since your Witness Statement of March 2012]	and the second s
	,		
Previous State [Identify by dat	ements, Deposite and title all thos	tions and Reports: se since your Witness Statement of March 2012]	
OFFICIAL USE: List of previous statements, depositions and reports:			
Ref:	Date:		
091-008-035	25.04.06	Deposition to the Coroner	THE RESIDENCE OF THE PARTY OF T
WS 138/1	14.03.12	Witness Statement to the Inquiry	
WS-138/2	18.09.12	Witness Statement to the Inquiry	
WS-138/3	10.12	Witness Statement to the Inquiry	

IMPORTANT INSTRUCTIONS FOR ANSWERING:

Please attach additional sheets if more space is required. Please identify clearly any document to which you refer or rely upon for your answer. If the document has an Inquiry reference number, e.g. Ref: 049-001-001 which is 'Chart No.1 Old Notes', then please provide that number.

If the document does not have an Inquiry reference number, then please provide a copy of the document attached to your statement.

With particular reference to your entry in the medical notes and records of Claire Roberts made on 22.10.96 (Ref: 090-022-053-4), a colour copy of which is attached, please confirm the following:

- (1) What was your practice in 1996 as regards the use of green ink for making entries into the medical notes and records of patients?
 - I cannot recall that I had any particular practice in relation to the colour of pen I used in making entries into the medical records of patients in 1996. I do recall using a fountain pen with green ink but I do not believe that this was a pen that I used exclusively.
- (2) What was your practice in 1996 as regards the use of the 12-hour and 24-hour clock for making entries into the medical records notes and records of patients?
 - I cannot recall that I had a particular practice when identifying the time entry on medical records in 1996. I do not believe that I used one or other of the 12-hour or 24-hour clock exclusively.
- (3) Did you enter the time ("4pm") to the column at the left of the entry? If so please explain:

I cannot be certain that I entered 4pm in the column beside my note but I believe I probably did make this entry as it appears like my hand writing.

(i) When you did so

I believe I made this entry shortly after writing my note following my first visit to Claire at or around 2pm on 22^{nd} October 1996.

(ii) Why a different colour pen is used

I cannot recall for certain why a different pen is used but I do recall I did not wear a jacket while working in the Hospital. I carried a clinical bag with stethoscope, patellar hammer and other instruments. I also kept my fountain pen in this bag. I would have written my clinical note while sitting beside Claire's bed. On finishing my note I would have capped my pen and returned it to my bag. I would then have spoken to the Nurse and Doctor looking after Claire about the contents of my note. I would then have returned Claire's chart to the Nursing Station. At this point I would often re-read my note to make sure I was happy with the content before returning it to the chart trolley. If I had noted at that point that I had not entered a time I would very likely have borrowed a biro to make the entry rather than look for my pen. I believe I entered 4pm in error and intended to write 14.00.

(iii)	Why the 12 hour clock is used in this entry and the 24 hour clock in your subsequent
	entry (Ref: 090-022-054)

I do not believe I used either the 12-hour clock or the 24 hour clock exclusively in 1996.

- (4) Further to the following statement made in deposition to the Coroner: "The next medical note entry is dated October 22nd 1996 at 4pm and is written by myself... Although the note is timed 4pm it would seem more likely from the ensuing medical and nursing notes that this entry was actually written at around 2pm" (Ref: 139-156-015) please explain:
 - (i) How this statement is to be interpreted with specific regard to the "4pm" time entry in the left column
 - I believe I wrote my medical note shortly after seeing Claire at around 2pm on October 22nd 1996. I believe I intended to write 14.00 but for some reason wrote 4pm.
 - (ii) The circumstances in which the "4pm" entry was madeSee3 (ii)
- (5) If you did not enter the "4pm" time please state when it was done, identify who did it, state whether it was done under your instruction and if so, explain why

See 3 (ii)

(6) Provide any further points and comments that you wish to make, together with any relevant documents.

THIS STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF

Signed:

Driewell-

Dated: 19, 2, 13