

Dr Rashid Sohail
HM Coroner's Office,
Manchester City Area,
PO Box 532
Manchester Town Hall,
Albert Square,
M60 2LA

6th floor
Skipton House
80 London Road
London
SE1 6LH

Business manager email:
kathyosborn@nhs.net

24 January 2018

Dear Dr Sohail,

Re: Regulation 28 Report to Prevent Future Deaths – Stephen Coulson (died 01.01.2016)

Thank you for your Regulation 28 Report dated 27 October 2017 concerning the death of Mr Coulson on 1st January 2016. Firstly, I would like to express my deep condolences to Mr Coulson's family.

Following the inquest you raised concerns to NHS England regarding

- The use, documentation and audit of **controlled drugs**,
- The Trust's **observation policy** for patients using controlled drugs and
- The **high level investigation** itself.

All NHS Trusts must have a Controlled Drug Accountable Officer (CDAO). This person would be a senior manager within their organisation but who does not routinely supply or handle controlled drugs themselves. The roles and responsibilities of CDAOs, and the requirement to appoint them, are governed by the [Controlled Drugs \(Supervision of Management and Use\) Regulations 2013](#).

As we understand the Trust's initial response did not include engagement with their Controlled Drug Accountable Officer. We recognise that there was a lack of engagement with the relevant personnel regarding this incident. We are pleased to learn that the Trust's revised response does now include an action plan which is a good indication that lessons have been learnt about the vital role CDAOs play in reference to controlled drugs.

The Trust has now implemented an extensive action plan, they have:

- Updated the Trust Controlled Drug Policy to include reference to the Opiate Patch Monitoring Form to ensure that the clinical team are aware of the opiate patches worn and administration date.
- Update the Opiate Patch Monitoring Form to ensure it is explicit that opiate patches worn on admission are recorded and that removal of any opiate patch is documented and signed for by a registered nurse.
- That patient observations are recorded a minimum of 12 hourly in addition to routine observations. This will be audited to ensure compliance.

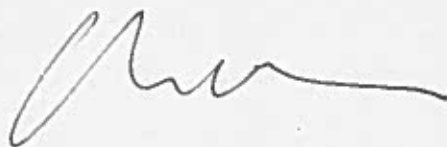
- Amend Nursing admission documentation within surgery to include the questions to all patients to check if they are wearing an opiate patch and what dose this is.
- Develop and deliver further education around assessment and treatment of delirium
- Undertaken further education in relation to neurological assessment and completing physiological observations if a patient has a new confusion
- Implement teaching on new starters induction, mandatory training and 3 yearly acute illness training regarding when to undertake neurological assessment and escalation of deterioration
- Implement a new electronic neurological observation chart. The above will ensure any alteration in patient physiology specifically in any alteration in neurological status.
- Include clinical scenarios involving the prescribing of fentanyl patches and appropriate dose increases and monitoring requirements in doctors education. Educate regarding the appropriate dosing of patches as opposed to other routes.

The CDAO at the Trust reports controlled drug incidents into the Greater Manchester Controlled Drug Incident Reporting system which they investigate and where applicable share the lessons learnt. This system is being rolled out across England with the prime object to share good practice and implement lessons learnt. A newsletter will be shared with prescribers and nursing staff across Greater Manchester to highlight the issues above in the Trust's action plan.

NHS England will recommend to all Controlled Drug Accountable Officers in each locality to remind the Controlled Drug Accountable Offices of Designated Bodies to ensure they are actively involved in providing evidence at the Coroner's Inquest.

Thank you for bringing this important patient safety issue to my attention and please do not hesitate to contact me should you need any further information.

Yours sincerely,



Dr Arvind Madan
Director of Primary Care and Deputy Medical Director
NHS England