



Locala
Beckside Court
286 Bradford Road
Batley
WF17 5PW
030 3003 4529
www.locala.org.uk

PRIVATE & CONFIDENTIAL

Mrs M Burke
HM Assistant Coroner
(Western District) City Courts
The Tyrls
Bradford
West Yorkshire
BD1 1LA

13 September 2017

Dear Ma'am

**INQUEST TOUCHING UPON THE DEATH OF PAULINE TAYLOR DECEASED –
REGULATION 28 REPORT RESPONSE**

Thank you for your letter dated 21 July 2017 attaching the Regulation 28 report to prevent future deaths that you issued following the conclusion of the Inquest you held touching upon the death of Pauline Taylor.

This is the Response of Locala Community Partnerships. As an organisation we have considered the content of your report very carefully. We note that at section 5 you have raised a number of matters of concern relating to zerobase and other emollient creams which whilst containing potentially a relatively low level of paraffin, still pose a potential fire hazard risk. We note the recommendations concerning warnings on the packaging and to members of the public at large, who as you note are able to purchase many such creams over the counter. Locala would support the raising of awareness in this area and if it is permissible, would be interested to see the responses that you obtain from the other recipients of your Regulation 28 report that have a broader remit.

Within Locala, we have undertaken work to share the learning from this case in relation to the risks posed by any cream, lotion or other substance that contains any amount of paraffin. As was evident from the evidence given at the Inquest there are potentially a large number of such products that are regularly in use.

In May 2017, within our monthly medicines management report that goes to all business units, we specifically raised the issue concerning paraffin containing skin products and made reference to a guidance document produced by the South West Yorkshire Area Prescribing Committee, advising staff this must be adhered to when prescribing or treating patients with paraffin based emollients. The Prescribing Committee's advice note was attached to our medicines update and a copy of this is attached. In particular, this document identifies that any paraffin containing product poses a risk, regardless of the amount of paraffin contained within it.

Caring for you, locally

This does represent a shift in emphasis as compared some previous guidance that had been issued about paraffin containing products. This advice note has been disseminated within Locala.

Training has also been updated to include reference to this latest guidance note regarding the use of paraffin based products and the use of such products now forms part of the risk assessment that has to be completed when requesting any air products from the supplier, Medequip.

This issue has also been discussed within team meetings amongst community nursing staff. This has also included warnings concerning service users that use an air mattress, where the risk is further heightened.

When Locala shares care of service users that are within a residential home there is a prompt on the form that has to be completed in relation to assessment of an individual's skin – the prompt tells staff to ensure appropriate fire risk assessments have been completed and the risk discussed with any patient that smokes, uses an air mattress and/or emollients.

Locala Live is a bulletin that goes to all staff and the Area Prescribing Guidance was also attached to this bulletin via a link, with a note advising staff of the risk associated with skin products containing paraffin. Staff were reminded relevant service users need to be advised of the risks.

Additionally, we are piloting a project in the Dewsbury locality where we are evaluating the use of non-paraffin based emollients as alternatives to those with paraffin. Local GPs are being involved and this project is to be evaluated in October 2017.

Many of these points are encapsulated on the attached action plan. There were two further specific concerns raised, at points 8 and 9 of the Regulation 28 report, concerning the fact no further risk assessment had been undertaken following a significant change in the Deceased's circumstances as at March 2015. It is perhaps noteworthy that the Deceased's underlying medical condition had not deteriorated as such, but it is acknowledged that there was a gradual change in her preferences in terms of the fact that whilst still being encouraged from time to time to leave her bed, the Deceased very largely preferred to remain within her bed in her last weeks.

There was no further specific risk assessment around March 2015. We note the evidence at the Inquest concerning the Deceased's capacity for decision making and also the acknowledgement that professional staff and family members were continuing to raise with the Deceased the dangers associated with her continued smoking of cigarettes in her bed.

The first two points on the action plan seek to address the issue you have raised concerning further risk assessment: the action Locala will seek to achieve is that further risk assessments will be completed on all patients who smoke and/or have emollients in use with or without air products, at any stage where there is a change in their physical, physiological or mental health condition or circumstances, and a change in their environment or habits as a result. In addition, a flowchart is being designed to enable staff to identify patients that are deteriorating with changing circumstances and documentation and training is being worked up to implement this throughout the organisation.

In relation to undertaking further risk assessments records are being audited to see that this happening, and situations are not being missed, and this is being managed through the community nursing team leaders group. They are responsible within their teams for ensuring staff understand the need for further risk assessment when circumstances change.

May I thank you again for raising these matters. CQC have contacted us concerning the Regulation 28 report and we trust that it is in order that we have provided them with a copy of this response and our action plan.

Yours sincerely

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Director or Operations