

Department of Corporate Resources

City Solicitor's Office

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Dear Doctors

The Coronavirus Act 2020 gained the Royal Assent on 25th March 2020 and the provisions relating to changes to the registration process have now commenced by Regulation. It is important to note that the provisions are temporary modifications of the legislation to enable emergency measures commensurate to the pandemic and that the duty on registered medical practitioners to notify the coroner under The Notification of Death Regulations 2019 continues to apply when there is reason for the medical practitioner to suspect that a person's death was due to the unnatural circumstances specified under paragraph 3 as previously circulated by the Coroner.

The provisions now in place allow the following:

MCCD for registration purposes

The following applies to all natural deaths including COVID 19.

- A medical certificate can be accepted from any medical practitioner so long as they are able to state to the best of their knowledge the cause of death
- Registrars can accept MCCD's without referral to the coroner, provided it contains an acceptable cause of death, and indicates that a medical practitioner has seen the deceased either within the 28 days prior to death, or after death (this does not need to be the certifying medical practitioner) Therefore if the doctor who attended the person within 28 days prior to death is unavailable another doctor can sign the MCCD for all natural deaths including Covid-19 when the certifying doctor is able to access the deceased's notes and the information supports a natural death.
- Whilst these provisions are in force, if it is indicated that a patient was seen in the 28 days prior to death by video link (such as skype) this should be accepted as seen. The video link does not, however, meet the requirement for seen after death
- Covid-19 is an acceptable direct or underlying cause of death for the purposes of completing the MCCD and is not a reason on its own to refer a death to a coroner under the Coroners and Justice Act 2009; it is anticipated the majority of such deaths will not be referred.

- Although Covid 19 is a notifiable disease under the Health Protection (Notification) Regulations 2010, it does not mean referral to a coroner is required by virtue of its notifiable status, and there will often be no reason for deaths caused by this disease to be referred to a coroner, as long as the deceased was seen by a doctor after death or within the last 28 days of life.

Signing of the MCCD

- Provision for any registered practitioner to issue a MCCD without having personally attended the deceased, provided they are sufficiently able, from the available information, to ascertain the cause of death
- The declaration on MCCD's will be amended as necessary by certifying doctors. This will show whether or not they have been in medical attendance and if not whether another doctor has seen the deceased after death and/or within 28 days prior to death
- The after-death requirement will be through the existing ringed boxes on the MCCD
- If there is no other reason for the death to be referred to the coroner, the MCCD should be accepted.

The Registration

- Permission is granted to remove the requirement for a death or still birth informant to attend and provide details in person and the requirement for them to sign the register where a local authority can no longer offer face to face service registrations or where this is needed by way of additional contingency
- This will enable the information for the registration to be collected by telephone.
- Registrars will require secure email link to be used in order to receive and send information. GPs and doctors must use a **@NHS.net** email address to send MCCDs to the Register Office. Other NHS email addresses are not secure and should not be used. MCCDs should be sent using the @NHS.net address to : registrar@bradford.gov.uk

Qualified Informants

- The list of qualified informants is temporarily extended to include a funeral director (where they are acting on behalf of the family)
- Funeral directors are an addition to the existing list of qualified informants rather than a replacement. Informants will be taken in order of preference starting with a relative of the deceased.

Electronic transmission of documents

- The provisions also allow for the electronic transfer of documents relating to the certification and registration process (e.g. transfer of the MCCD from the medical practitioner to the registrar and the form for burial or cremation (the Green), from the registrar to the relevant authority).
- Under this arrangement these documents need to be completed as normal and can then be scanned or photographed and sent as an attachment to an email , though a wet signature is still required on the original.
- MCCDs **front and back** should be sent from a secure **@NHS.net** email address to registrar@bradford.gov.uk **Please also if possible in the covering email include contact details for proposed informants.**
- **Please ensure that the doctor's full name, medical qualifications and GMC number is clearly stated on the MCCD to avoid any delays.**
- After the emergency period, arrangements should be made to have original forms sent to the register office to be processed in the normal manner.

Cremation Form 4

- The provisions permit cremations to proceed on the basis of one medical certificate (cremation form 4), without the requirement to re-examine the body and complete a confirmatory medical certificate (cremation form 5)
- Deaths in custody will continue to require referral to the Coroner.

During this emergency the Registration staff will continue to work from City Hall with limited or no contact from the public. All registrations will be carried out over the telephone.

Appointments to register a death should be made in the usual way by telephoning 01274 432151. Checks will be in place to ensure that we have received the MCCD or coroner's report.

At the appointment time a registrar will telephone the informant and obtain the information required for the registration by direct questioning.

This is a difficult and challenging time for all of us and your help in keeping families informed is greatly appreciated.

If you have any queries in relation to these new arrangements please in the first instance will you email registrar@bradford.gov.uk and we will contact you as soon as possible.

Yours faithfully



Parveen Akhtar
City Solicitor/Proper Officer for Registration