15 June 2016

Consultation on the Introduction of Medical Examiners and Reforms to Death Certification in England and Wales

Response from the Institute of Biomedical Science

The Institute of Biomedical Science (IBMS) is the UK professional body for biomedical science. It represents approximately 20,000 members employed mainly in NHS laboratories, NHS Blood and Transplant, Public Health services, private laboratories, research, industry and higher education. Senior biomedical scientists in pathology laboratories are the individuals that have are primarily responsible for the management and safety of hospital mortuaries as part of their remit. In its capacity as a standard setting organisation, and also an HCPC approved education provider, the Institute welcomes the opportunity to contribute to this consultation albeit in a general position of support for the proposals rather than in response to the specific questions. We hope this is acceptable and will be acknowledged as part of the overall voice of support.

It is our opinion that this is an essential and long overdue move. The introduction of dedicated Medical Examiners will be an important step towards creating a robust procedure, which has the capabilities to support both relatives of the deceased and those who are currently tasked with finding the time to ‘investigate’ and satisfy themselves about the cause of death - a ‘triage’ approach rather than an investigation in the true sense of the word.

The procedure by which it is carried out is not as easy to define as there are significant cost implications to be considered. In an ideal world, the full review of both processes (burial & cremation) should be considered and the procedure updated to reflect these findings. The cost implications require the various service users/stakeholders to come on board with the spirit of the plan in order for its success and our concerns are that there may not be universal enthusiastic adoption. There will inevitably be cost implications to train these MEs and, once trained, their competence must be regularly assessed. The suggestion of a fixed fee (about £100) will cover part of the process but the upfront and running costs could be insignificant. Alongside this, there will need to be a much more developed administrative process and this too will be costly.
From a more general perspective we feel that the documents are comprehensive. However, occasionally there are areas that lack clarity and even ambiguity or at least a lack of assuredness in among the firmer plans. It is our concern that any lack of clarity could affect the robustness of the implementation and running.