



HER MAJESTY'S CORONER  
For West Yorkshire West Coroner Area

To: All Doctors within West Yorkshire West Coroner Area

Your ref:

Our ref: MDF/MC

2 April 2020

Dear All,

**COVID-19 PANDEMIC – INFORMATION TO DOCTORS  
RE MEDICAL DEATH CERTIFICATION AND REFERRAL TO CORONER  
CHANGES TO THE LAW BY THE CORONAVIRUS ACT 2020**

**2 APRIL 2020**

1. The Coroner's Service has received many enquiries from General Practitioners about death certification.
2. This document is intended to assist by providing information to Doctors from the perspective of the Coroner. It is given with the caveat that it is not for the Coroner to advise General Practitioners how to conduct their practices; these are issues for the General Medical Council and the British Medical Association from whom such advice should be sought.
3. The Coronavirus Act 2020 makes significant changes to the certification of death by medical practitioners by providing more flexibility during this emergency situation such that in certain circumstances a Doctor who may not have seen the deceased can certify the cause of death without the death being referred to the Coroner. This allows the registration of deaths to operate effectively during the Covid-19 outbreak.
4. In passing the Emergency Legislation Parliament has determined the balance which needs to be struck between the retention of the safeguards within the existing system of death certification and the need to ensure the effective management of excess deaths during a coronavirus outbreak such as to justify the change.

5. The aim of the system be that every death from Covid-19 which does not in law require referral to the Coroner should be dealt with by the MCCD process. The Chief Coroner and the National Medical Examiner are in full agreement on this matter.

### **Completion of the Medical Certificate of the Cause of Death (MCCD)**

6. The Doctor who attended the deceased during their last illness has a legal duty to complete a MCCD and arrange for delivery of it to the relevant registrar as soon as possible to enable the registration to take place
7. The 'attendance' can be in person or by video link
8. A Doctor is required to issue a MCCD if
  - He or she is satisfied that they can state the correct cause of death to the best of the Doctor's knowledge and belief AND
  - The cause of death is entirely natural and EITHER:
  - The attendance was during the previous 28 days or
  - He or she has viewed the body after death. This viewing after death must be in person.
9. **Additionally:**

A registered Medical Practitioner who is not the Practitioner who attended the deceased during their last illness may sign a MCCD if:

  - The Practitioner who attended is unable to sign the MCCD or it is impractical for them to do so AND
  - The Medical Practitioner who proposes to sign the MCCD is able to state to the best of their knowledge and belief the cause of death.
10. The declaration on the MCCD should be amended as necessary by certifying Doctors to show whether they have been in medical attendance or not and if not whether another doctor has seen the deceased within 28 days or after death. If it is another Doctor their name and GMC registration details should also be provided on the MCCD. The after death requirement should utilise the existing ringed boxes.
11. MCCDs must be wet signed and must be scanned and transmitted to the registrar electronically.

### **Completion of Cremation Paperwork**

12. There are also changes to the requirements in respect of Cremation forms to permit cremations to proceed on the basis of Cremation Form 4 alone. The requirement for a confirmatory certificate (Cremation Form 5) is suspended.
13. Any Medical Practitioner can complete Cremation Form 4. They do not have to have seen the deceased. However a medical practitioner (not necessarily the medical practitioner who signs the Cremation Form 4) should have attended the deceased (including visual/video/skype consultation) within 28 days before death, or viewed the body after the death. 'Viewing' here means in person.

14. It is open to the Medical Referee to consult the Coroner's office should he so wish, before authorising the cremation.
15. Where the deceased has not been attended during their last illness during the last 28 days by any Medical Practitioner, a registered Medical Practitioner may complete a Cremation Form 4 only if they (or another Medical Practitioner) have seen the deceased after death in person.

### **COVID-19 is a Natural Cause of Death**

16. A death is typically considered to be unnatural if it has not resulted entirely from a naturally occurring disease process running its natural course, where nothing else is implicated.
17. COVID-19 is an acceptable direct or underlying cause of death for the purpose of completing a MCCD
  - COVID-19 as cause of death (or contributory cause) is not a reason on its own to refer a death to a Coroner under the CJA 2009
  - **It is acceptable to qualify mention of Covid-19 with words such as 'possibly' or 'probably' indicating the absence of a positive virology test or some ambiguity in clinical presentation, and such qualifiers do not in themselves imply sufficient doubt on the cause of death to require referral to a Coroner.**
  - **However for clarity, the recording of 'Probable Covid-19' or 'Possible Covid-19' as the cause of death is not acceptable on its own. However, when accompanied by an acceptable cause of death in part 1 of the MCCD it can be accepted for registration without the need for referral.**
  - COVID-19 is now a notifiable disease under the Health Protection (Notification) Regulations 2010 however referral to a Coroner is not required by virtue of its notifiable status (the notification is to Public Health England). There will often be no reason for deaths caused by this disease to be referred to a Coroner.
18. **To restate:**
  - COVID-19 is a naturally occurring disease and therefore is capable of being a natural cause of death.
  - When a Doctor believes according to their professional judgement that COVID-19 was involved they should certify as such, whether based on test results, symptoms or other clinical factors.
  - There may of course be additional factors around the death which mean a report of death to the coroner is necessary – for example where the cause is not clear, or where there are other relevant factors. This is set out in the **Notification of Deaths Regulations 2019** previously circulated. There may also be cases where an otherwise natural death could be considered unnatural.

**COVID-19 deaths should not require a post mortem**

19. Guidance from the Royal College of Pathologists states that in general if a death is believed to be due to a confirmed COVID-19 infection, there is unlikely to be any need for a post mortem to be conducted and a MCCD should be issued.

**COVID-19 cases should not be referred to the Coroner unless there is another reason for doing so**

20. There may be additional factors around a COVID-19 death which will mean that the death should be reported to the Coroner
21. In the event of any doubt the Coroner should be contacted
22. If no registered Medical Practitioner can sign a MCCD or a registered Medical Practitioner is not available within a reasonable time of a person's death, the death should be referred to the Coroner.

**Contact Details:**

To refer a death to the Coroner, please go to the West Yorkshire (Western) Coroners Website and complete the GP referral form.

Completed forms should be emailed to CoronersOffice@bradford.gov.uk from a secure email address.

For guidance in relation to referrals, contact the Coroners Officers on 01274 373721.

Register Office Contact details:

Bradford: Tel: 01274 432151 Email: Registrar@bradford.gov.uk

Calderdale: Tel: 01422 288080 Email: register.office@calderdale.gov.uk

Kirklees: Tel: 01484 221031 Email: huddersfield.registrars@kirklees.gov.uk

Tel: 01924 324733 Email: dewsbury.registrars@kirklees.gov.uk

Yours faithfully



Martin Fleming  
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West Yorkshire West Area