



T: 0131-244  
E: scottish.ministers@gov.scot

Mr Lewis MacDonald MSP  
Convener  
Health and Sport Committee

By Email

14 December 2020

Dear Lewis,

I am writing to you and the Health and Sport Committee to inform you of some changes to the way in which reviews are currently being undertaken by the Death Certification Review Service (DCRS).

### Background

DCRS was established by the Certification of Death (Scotland) Act 2011. One of its key functions is to review a random selection of Medical Certificates of Cause of Death (MCCD) in Scotland. Under normal circumstances, 10% of all eligible MCCD are randomly selected for a Level 1 review<sup>1</sup>, 2% are selected for a Level 2 review<sup>2</sup>, with approximately an additional 2% made up of interested person reviews<sup>3</sup>. DCRS also approve applications for repatriation where the deceased is to be buried or cremated in Scotland.

The purpose of the reviews is to check the quality and accuracy of MCCD and to improve the way that information about deaths is recorded. The reviews are carried out by a team of medical reviewers who are all experienced and trained doctors.

### COVID-19

In March 2020, I implemented section 20 & schedule 14 (part 1) of the UK Coronavirus Act 2020 which:

- Suspended the review of MCCD by DCRS. Reviews which were currently under way at the time of suspension were stopped and the deaths were registered.

---

<sup>1</sup> Level 1 reviews involve checking the MCCD and a discussion with the certifying doctor

<sup>2</sup> Level 2 reviews involve an additional, more detailed review of the clinical information surrounding the death and the MCCD.

<sup>3</sup> An interested person can apply to DCRS for a review of an eligible MCCD



- Suspended interested person reviews.

The suspension was considered vital to lessen the burden on front-line doctors who were busy delivering care to increasing numbers of ill patients.

My officials kept this suspension under close review and on 11 May 2020, DCRS reinstated reviews of eligible MCCD at a reduced level of 4%. Between 11 May 2020 and 31 August 2020, reviews were limited to hybrid Level 1 reviews. Central to this form of review was the ability of the medical reviewer to scrutinise the electronic Key Information Summary (eKIS) in order to determine whether the MCCD was in order. Access to eKIS was normally only undertaken for level 2 reviews. In addition Medical Reviewers could support certifying doctors with email amendments and notify registrars of admin errors. Detailed Level 2 reviews, which often require scrutiny of full paper case records from GP surgeries or hospitals, and are more resource intensive for hospital administrative staff, were limited to those which needed escalation from Level 1 reviews and for interested person reviews.

DCRS returned to reviewing at pre-pandemic levels, from 31 August 2020.

### Current Position

COVID-19 infections have been rising again in Scotland and, coupled with early winter pressures, is leading to certifying doctors having increased demands on their time and becoming more difficult to contact as part of the review process. The current pressure on the NHS is unlikely to ease in coming weeks and may well increase during the winter months ahead. The impact of DCRS continuing to operate at normal service levels is likely to be overly burdensome on front-line doctors delivering care to patients and could lead to delays in registering deaths and to funerals.

However, it is also important to recognise the role that MCCD reviews have in improving the quality and accuracy of MCCD and in providing public reassurance that COVID-19 is being accurately listed as a cause of death.

To balance the burden on front-line doctors while maintaining necessary scrutiny, from 24 November 2020, we again reverted to an adjusted schedule of MCCD reviews. In discussion with DCRS and National Records of Scotland (NRS), and considering the requirements of relevant legislation, we decided that 12% of eligible MCCD will continue to be randomised for review, but these will be limited to hybrid Level 1 reviews. Detailed Level 2 reviews, which could be more resource intensive for hospital administrative staff, will be limited to those which need escalation from Level 1 reviews and for interested person reviews.

We believe this is a balanced and proportionate response under the current circumstances of the pandemic; it reaches a careful balance between adequate scrutiny of MCCD, DCRS capacity, and impact on certifying doctors. The position will be reviewed every two weeks.

**JOE FITZPATRICK**

