

23rd March 2018

The Senior Coroner
Black Country Coroners Court
Jack Judge House
Halesowen Street
Oldbury
West Midlands B69 2AJ

Dear Sir

Inquest into the death of Natasha Ford – Regulation 28 report

I write with reference to the Regulation 28 report to prevent future deaths that you made following the Inquest into the death of Ms Ford. The contents of this letter has been approved by the Chief Executive of CAS Behavioural Health.

You have expressed concerns in section 5 of your report on the basis of the evidence you heard at the Inquest “that there was a previous incident on 27 July 2017 where [Miss Ford] had placed a plastic bag over her head. Plastic bags were then restricted for a short time and then blanket restrictions were removed. This was due to a change in a policy in procedure and in line with Reducing Restrictive Practice Policy and Procedure”.

As stated by Ms [REDACTED] in her evidence at the inquest on behalf of CAS Behavioural Health and as reflected in the report that she provided to you for the purposes of the Inquest, at the time of the incident in July 2017 risk items were then restricted and removed from Ms Ford’s possession but later reintroduced once the Clinical Team assessed the risk as having reduced. This was in accordance with the CAS Policy and Procedure on Reducing Restrictive Practice in place at the time, this Policy reflecting the relevant provisions of the Mental Health Act Code of Practice that provides at chapter 26.37 that restrictions:

- *be used for no longer than necessary to prevent harm to the person or to others;*
- *be a proportionate response to that harm, and*
- *be the least restrictive option.*

After the incident on 19 September 2017 and the subsequent sad death of Ms Ford, CAS Behavioural Health reviewed the approach taken in its Policy and Procedure on Reducing Restrictive Practice. In doing so, it has taken into account guidance published by the Care Quality Commission entitled “Brief Guide: The Use of “Blanket Restrictions” in Mental Health Wards”. Whilst the CQC Guidance adopts the approach of the Mental Health Act Code of Practice, it does acknowledge that all mental health inpatient services have some prohibited or “contraband” items and that certain prohibited items, including plastic bags, should not be challenged by the CQC for breaking the approach to blanket restrictions in the Code of Practice.

Raglan House, Raglan Road, Smethwick, B66 3ND

Tel: 0121 555 0560 Fax: 0121 555 0589

Following the review of the relevant Policy, CAS Behavioural Health has introduced a blanket policy restricting the use of plastic bags in all their hospitals. This Policy was put in place in October 2017 and a copy is enclosed. As a result of this Policy, no patients in any CAS hospitals are permitted to have access to plastic bags in hospital. This applies to all patients, notwithstanding the risk assessments undertaken in respect of each patient.

All patients in hospitals operated by CAS Behavioural Health have in place a reducing restrictive practice plan that is reviewed monthly for the individual patients. There is a similar plan for the hospital/unit location that is reviewed three monthly. These plans detail why the relevant restrictions imposed on patients are necessary and what actions are being undertaken to reduce the restrictions. Again, this reflects the approach of the Mental Health Act Code of Practice, but I must emphasise that, as stated above, it does not apply to the use of plastic bags as these are now restricted by way of a blanket policy.

CAS Behavioural Health intend to maintain the blanket ban on plastic bags in all their hospitals.

CAS Behavioural Health and I, on behalf of Raglan House, consider that this fully addresses the concerns that you expressed in your Regulation 28 report. However, if you have any further questions, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Raglan House'.

*Hospital Director
Raglan House*

Raglan House, Raglan Road, Smethwick, B66 3ND

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