

**Ms Anna Loxton**  
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**National Medical Director**  
NHS England  
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[REDACTED]  
[REDACTED]  
6 February 2023

Dear Ms Loxton,

**Re: Regulation 28 Report to Prevent Future Deaths – Sandra Kirk who died on 2 August 2021.**

I write in response to the email received from your colleague [REDACTED], dated 25 January 2023, regarding Ms Sandra Kirk.

As per my previous correspondence dated 12 January 2023, I wish to reiterate my condolences to Sandra's family and loved ones. I appreciate this will have been an incredibly difficult time for them, and I want to stress that NHS England takes the concerns and issues raised in every PFD report very seriously. I therefore apologise that both yourself and Sandra's family do not feel that NHS England's initial response to your Report dated 26 September 2022 adequately addressed the specific concerns raised, particularly around the risk of ligatures in the inpatient mental health unit setting, and the guidance provided to staff in mitigating this risk (as per the Ligature Risk Reduction Policy and the Ligature Audit Tool / Risk Assessment). I also sincerely apologise that the previous response provided by NHS England has come across as a "very general response to reducing the risk of suicide", rather than addressing your matters of concern.

In your Report dated 26 September 2022, you raised concerns regarding the relevant Ligature Risk Reduction Policy which was in place, which does not give guidance on minimising potential ligatures themselves (only ligature anchor points) and does not emphasise the very real risk that specific items of clothing, such as belts and shoelaces, can pose to vulnerable patients. Further, there is only a limited degree of risk reduction with observations taking place four times per hour for high-risk patients not in immediate crisis, as death by ligature can occur within a few minutes. You therefore directed that the efficacy of the policy should be considered, including whether it can be improved.

In respect of the specific concerns in your Report regarding Cygnet's Ligature Risk Reduction Policy and Ligature Audit Tool / Risk Assessment, these are outside of NHS England's remit and are more matters for Cygnet to action, which is why our previous response did not fully address the same. However, I can confirm that NHS England

has had sight of the full Root Cause Analysis (RCA) report dated 4 January 2022 and we note that the main learning points which were identified included contemporaneous record keeping, named nurse practice and a review of general observation practice. Our regional team have liaised further with Cygnet, who have advised that they are providing ligature training as part of the induction process for all new staff, and they have a contraband list in place across all in-patient areas. They are also planning on enhancing their ligature risk reduction policy, which will include associated awareness training and identifying risk in their patients.

Regarding the national guidance around risk assessments (relevant to your comments around observations and risk reduction), I would like to provide my assurance that this is currently being reviewed and work is underway to assess a move to a more personalised safety planning approach, in line with an evidence base. The concerns raised in PFD reports, including your Report dated 26 September 2022, are communicated to the national policy and programme teams to help inform their work around this.

We hope to have further updates on the above, as well as the quality programme for Mental Health, Learning Disabilities and Autism (MHLDA) inpatient services referenced in my last letter, in due course. We are more than happy to provide you and/or Sandra's family with another update once these developments have taken place, if this would assist?

I would also like to provide further assurances that the Regulation 28 Working Group, who closely monitor and share learnings and commitments arising from or linked to PFD reports, will continue to do so in this case.

I hope that the above sufficiently addresses your previous concerns, and I am very sorry that you have had to request a further response from NHS England on this occasion.

Please do not hesitate to contact me should you need any further information.

Yours sincerely,



National Medical Director  
NHS England