

Legally Privileged & Confidential

Mr Andrew Bridgman
HM Assistant Coroner for Manchester South
HM Coroner's Office
1 Mount Tabor Street
Stockport
SK1 3AG

[REDACTED]

[REDACTED]

28 May 2026

Dear Mr Bridgman,

Regulation 28 Report to Prevent Future Deaths following the inquest touching upon the death of Ms Susan Toft

1. I am writing to you on behalf of the British Healthcare Trades Association (**BHTA**) in response to your Regulation 28 Report dated 14 April 2026, following the inquest into the death of Ms Susan Toft. I wish to express our deepest sympathy and sincere condolences to the family and friends of Ms Toft.
2. By way of background, the BHTA is a not-for-profit trade association representing over 400 members within the healthcare and assistive technologies sector. Our membership comprises retailers, installers, service providers, distributors, and manufacturers, all of whom supply essential healthcare equipment and services to both the public and private sectors.
3. Through proactive stakeholder engagement and close working relationships with national and international regulators and bodies, we strive to improve industry standards through lobbying for positive change, promoting consumer protection by ensuring people who need our members' products and services – often vulnerable because of their age or medical condition – can be confident they are treated fairly, and supporting our members in navigating evolving policy and regulatory landscapes.
4. The BHTA Code of Practice (**CoP**), which is approved and audited by the Chartered Trading Standards Institute, sets out the rigorous rules and principles to which our members voluntarily commit. Membership of the BHTA is not compulsory; rather, it is a mark of distinction for organisations that are dedicated to exceeding minimum legal requirements and operating to higher standards of customer protection than the law requires. The CoP is designed to assure those relying on our members' products and services that they are dealing with reputable companies who place their best interests at the forefront.
5. Sunrise Medical Limited and Invacare Limited are both members of the BHTA. It is currently unclear which company provided Ms Toft's adapted vehicle, and the demonstration to her husband regarding the securing of a wheelchair within the vehicle. As such, I am unable to

confirm whether the customer facing business in question is a BHTA member. If you are able to provide the relevant company details, I will be pleased to confirm the membership status.

6. Your report references the International Best Practice Guidelines BPG1: Transportation of People Seated in Wheelchairs (the **Guidelines**) and raises two principal concerns:
 - a) whether there are more robust and reliable methods of securing a seat cushion to a wheelchair base to prevent detachment, as highlighted in Section 4.5 of the Guidelines; and
 - b) whether an assessment should have been carried out at the time Ms Toft received her adapted vehicle to determine if adjustments to the occupant restraints were required to ensure her safety, and to advise that reassessment may be necessary should her wheelchair change, as discussed in Section 5 of the Guidelines.
7. We fully appreciate the importance of these concerns and the need to prevent future incidents. However, I must clarify that the BHTA does not possess regulatory authority, nor do we set or enforce technical standards or produce technical guidance. The Guidelines referenced in your letter were published by the Posture and Mobility Group (**PMG**), which is not a member of the BHTA, and the BHTA is not involved in the formation, publication, or implementation of these Guidelines or other such guidance.
8. Our role is to support our members in complying with applicable legislation and to share best practice, but we do not have the power to mandate changes to technical standards or product design. Issues such as those raised during the course of your investigation and outlined in your report were not previously raised with us, including by our members, and we were not aware of the incident leading to Ms Toft's death until receipt of your report.
9. That said, we recognise the vital importance of raising awareness of these issues within our sector. The BHTA is committed to publicising your findings and the concerns raised in your report to our members and the wider industry, in order to encourage positive change. To this end, we will report on the incident and your specific concerns in our monthly THIIS (The Homecare Industry Information Service) online magazine, which is widely read by retailers and manufacturers, using information that is publicly available. The May 2026 edition of THIIS, which is appended to this letter, featured an article touching upon certain elements related to this incident (i.e. mounting accessories onto wheelchairs and attaching seat cushions), which were identified as topics of discussion in recent BHTA meetings. The article was prepared prior to, and independently of, any knowledge of this inquest, and its content reflects wider industry discussions rather than any specific case. If appropriate given the sensitivities of this case, we would be happy to consult with Ms Toft's family regarding a more tailored report relating to issues raised as part of your investigation and the content of such a report, should they wish to have input into this process. We would be grateful if the Coroner could pass on our contact details to the family, should the family wish to engage with us. In addition, we will encourage our members to review their practices in light of the issues identified and to engage with the relevant regulatory and technical standards bodies where appropriate.
10. We hope that by raising awareness and encouraging discussion and review among those with the authority to act, we can help to improve safety and prevent future deaths.
11. If you require any further information or clarification, please do not hesitate to contact me.

Yours sincerely,

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Chief Executive Officer

British Healthcare Trades Association