



2015-05/012
T:\D102

29 May, 2015

Senior Advisor - Nursing
Office of the Chief Nurse
Ministry of Health
WELLINGTON 6160
By email: Alison_Hussey@MOH.govt.nz

Kia ora Alison

Verifying death: draft guideline for consultation

The New Zealand Nurses Organisation (NZNO) welcomes the opportunity to comment on the draft practitioner guideline and documentation form for verifying death. NZNO has consulted widely with all member groups and professional nursing and policy staff. NZNO welcomes this sensible updating of regulation to include nurses and midwives amongst the health practitioners who may verify death, but notes that enrolled nurses (ENs) should also be able to verify death. Both documents were well received and supported. Comments and suggestions from the substantial feedback received are included in the brief discussion below.

1. A Practitioner Guideline:

The guideline generally achieves its aim of providing clear, apposite information to practitioners, employers and managers. It will enable support for both professional development of the health workforce and guide practice. It is a clear and readily understood process which will allow for a more timely transition for families, when added stress through delays can be stressful.

The context it establishes for nurses i.e. situations in which verification of death prior to death certification may be useful, is applicable to ENs. ENs work in aged care, palliative care and in rural areas etc., where the ability to verify death to expedite care of the body and reduce family distress is useful. They are regulated nurses whose education practice and employment is suited to the purpose of being able to voluntarily verify death. ENs should be included in the list of health practitioners able to verify death. ENs also have the highest proportion of Māori of any regulated health practitioner group, which is relevant since it is sensitivity to cultural issues, not practicality alone that makes timely verification of death necessary/desirable.

We note that the guideline does not mention te Tiriti o Waitangi obligations to Māori or the need for cultural awareness and competence. This is surprising and disappointing given the significance to Māori of protocols around tūpāpaku and recent amendments to the Coroners Act to improve services for whānau so that they are culturally safe. Cultural safety is also important for other ethnic and religious groups and there may be an opportunity with the verification of death process to ask if karakia or other ceremonies are wanted. Cultural safety, and the training and cultural competence necessary to ensure it, should be included in the guideline.

The section **Reporting Deaths to the Coroner** states that "*A death does not need to be reported when death was expected or is explainable as the result of illness...*". This appears to be contradicted in the following paragraph which says: "*However section 14 of the Coroners Act (2006) requires that any person who finds a body must report the finding to the Police.*" Does this mean, for

example, that a caregiver in a rest home who finds one of the residents deceased, even when this is expected, has to phone the police? Some clarification may be needed here.

NZNO **recommends** that the guideline includes:

- ENs among the regulated practitioners able to verify death;
- specific reference to te Tiriti o Waitangi;
- Māori expectations for handling the deceased; and
- refer to the need for culturally appropriate competence from the time the person dies.

2. Draft documentation form (for use by practitioners to record the assessment and the time and place they assessed the deceased.)

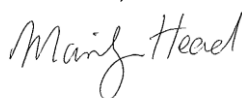
This was universally praised as being “a refreshingly simple and easy to use form”. We suggest however that would be helpful to clarify:

- where the form should go, for example with the deceased or with the clinical notes;
- if the verification form must be completed for all deaths, or can the information that is on the verification form be written directly into the patients notes;
- if nurses can verify death only as part of their formal practise; and
- that the verification process is a national standard, not open to local interpretation.

We also suggest it may be appropriate to have something like the following whakataurangi on the form to acknowledge the deceased: *Hoatu te manaua kua wheturangitia i te korowai o Ranginui.*

Once again, thank you for the opportunity to contribute to the development of this guideline.

Nāku noa, nā



Marilyn Head
Senior Policy Analyst
DDI 4 494 6372
marilynh@nzno.org.nz

NEW ZEALAND NURSES ORGANISATION (NZNO)

NZNO is the leading professional nursing association and union for nurses in Aotearoa New Zealand. NZNO represents over 46,000 nurses, midwives, students, kaimahi hauora and health workers on professional and employment related matters. NZNO is affiliated to the International Council of Nurses and the New Zealand Council of Trade Unions.

NZNO promotes and advocates for professional excellence in nursing by providing leadership, research and education to inspire and progress the profession of nursing. NZNO represents members on employment and industrial matters and negotiates collective employment agreements.

NZNO embraces Te Tiriti o Waitangi and contributes to the improvement of the health status and outcomes of all peoples of Aotearoa New Zealand through influencing health, employment and social policy development enabling quality nursing care provision. NZNO's vision is *Freed to care, Proud to nurse.*