

## **Site visit inspection report on compliance with HTA minimum standards**

**Royal Preston Hospital**

**HTA licensing number 12037**

**Licensed under the Human Tissue Act 2004 for the**

- **making of a post mortem examination;**
- **removal from the body of a deceased person (otherwise than in the course of an anatomical examination or post-mortem examination) of relevant material of which the body consists or which it contains, for use for a scheduled purpose other than transplantation; and**
- **storage of the body of a deceased person or relevant material which has come from a human body for use for a scheduled purpose**

**13 February 2013**

### **Summary of inspection findings**

The HTA found the Designated Individual, the Licence Holder (LH), the practices and the premises to be suitable in accordance with the requirements of the legislation.

Although the HTA found that The Royal Preston Hospital (the establishment) had met the majority of the HTA standards, shortfalls were found, particularly in relation to standard operating procedures (SOPs), traceability, the reporting of serious untoward incidents (SUIs) to the HTA and overflow storage facilities.

Particular examples of strengths and good practice are included in the concluding comments section of the report.

## **The HTA's regulatory requirements**

The HTA must assure itself that the Designated Individual, Licence Holder, premises and practices are suitable.

The statutory duties of the Designated Individual are set down in Section 18 of the Human Tissue Act 2004. They are to secure that:

- the other persons to whom the licence applies are suitable persons to participate in the carrying-on of the licensed activity;
- suitable practices are used in the course of carrying on that activity; and
- the conditions of the licence are complied with.

The HTA developed its licensing standards with input from its stakeholders. They are designed to ensure the safe and ethical use of human tissue and the dignified and respectful treatment of the deceased. The HTA inspects the establishments it licences against four groups of standards:

- consent
- governance and quality systems
- premises facilities and equipment
- disposal.

This is an exception-based report: only those standards that have been assessed as not met are included. Where the HTA determines that a standard is not met, the level of the shortfall is classified as 'Critical', 'Major' or 'Minor' (see Appendix 2: Classification of the level of shortfall). Where HTA standards are fully met, but the HTA has identified an area of practice that could be further improved, advice is given to the DI.

Reports of HTA inspections carried out from 1 November 2010 are published on the HTA's website.

## **Background to the establishment and description of inspection activities undertaken**

This was a routine inspection of the establishment to assess the suitability of the Designated Individual (DI), premises, facilities, practices and staff engaged in HTA licensed activities, and compliance with HTA standards. The DI is a pathologist and Head of the Cellular Pathology Department. In order to cover the areas of quality management, consent and mortuary management, the DI has appointed three Persons Designated (PD). The establishment performs approximately 900 coronial post mortem examinations (PMEs) each year, of which about 30 are Home Office PMEs, and five hospital PMEs. There is a specialist neuropathologist on site who performs an average of 05 PMEs each year. Paediatric cases are referred to another HTA-licensed establishment.

This was the establishment's second routine inspection, having been previously inspected in December 2009. Advice provided to the DI during the previous inspection had been acted upon.

The inspection included interviews with key members of staff working under the licence. In addition to the DI, these included the Mortuary Manager, senior anatomical pathology technician (APT), and individuals from the Coroner's office and the bereavement office. As well as a review of documentation relevant to the establishment's activities, a visual inspection of the mortuary was conducted, including the body store, routine and high-risk post

mortem rooms, and the histopathology laboratory where tissue samples are stored. In addition, audit trails were conducted in the body store; unique identifiers for three bodies were checked on wrist tags, labels on fridge doors and the mortuary register. Traceability audits were conducted at the histopathology laboratory for tissue blocks and associated slides, with details checked against histology and consent forms. No anomalies were found.

### Inspection findings

The HTA found the Designated Individual and the Licence Holder to be suitable in accordance with the requirements of the legislation.

### Governance and Quality

Standard	Inspection findings	Level of shortfall
<p>GQ1 All aspects of the establishment's work are supported by ratified documented policies and procedures as part of the overall governance process.</p>	<p>The SOP on refrigerated storage monitoring does not include checks that should be made of the temperature monitoring or details of trigger points for alarms.</p> <p>The SOP relating to body identification does not make reference to the use of red wrist bands for bodies with same or similar names.</p> <p>The SOP on body handling does not reference the routine use of the bodies on rollers in storage (BORIS) facility for storing bodies (see PFE3).</p>	<p><b>Minor</b></p>
<p>GQ6 A coding and records system facilitates traceability of bodies, body parts, tissues and cells, ensuring a robust audit trail.</p>	<p>The number assigned to each body and recorded in the mortuary register is not used to identify tissue taken at PME. Tissue samples are assigned a special number in the mortuary. There is no link between samples and the bodies from which they were removed other than the name of the deceased.</p> <p>Corrections in the mortuary register were not initialed or dated as is best practice and did not allow readers to see the information that had been corrected.</p> <p>Although not documented in its SOP, the establishment's procedure for handling bodies with the same or similar name is to place a red wristband on each body. However, on the day of the HTA inspection, this had not been done for two bodies in the body store. The corresponding entries in the mortuary register had also not been highlighted with the phrase 'check names', as is required by the establishment's SOP.</p>	<p><b>Minor</b></p>

GQ7 There are systems to ensure that all adverse events, reactions and / or incidents are investigated promptly.	There is no system in place for reporting SUIs to the HTA within five days of discovery. With the exception of the DI, people working under the licence were unaware of this requirement.	<b>Minor</b>
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**Premises, Facilities and Equipment**

<b>Standard</b>	<b>Inspection findings</b>	<b>Level of shortfall</b>
PFE3 There are appropriate facilities for the storage of bodies, body parts, tissues, cells, consumables and records.	<p>Staff are instructed to contact the maintenance unit if there are any problems but currently mortuary fridges and freezers are not monitored for trends in temperature over time.</p> <p>In addition to the main body store, the establishment makes use of the overflow, BORIS facility. At the time of the inspection, this was being used as routine storage to ensure that the body store always has ten vacant trays for storing the bodies of deceased bought in outside of working hours. However, BORIS is not on a regular maintenance contract and at the time of inspection the temperature was not monitored and 'out-of-specification' alarm systems were not in use.</p>	<b>Major</b>

## Advice

The HTA advises the DI to consider the following to further improve practices:

No.	Standard	Advice
1.	GQ1	Guidance written on the body store whiteboard and on the isolation fridges states that bodies suspected of being infected with various high-risk agents, including <i>Escherichia coli</i> , should be placed in body bags and put into the isolation fridges. The list of infectious agents did not correlate with a laminated version of this guidance attached to a mortuary notice board. The latter should be updated/removed for clarity.
2.	GQ1	The DI is advised to revise guidance within the high-risk post mortem room on how to contain and disinfect blood spillages. Two separate signs were present, side by side, each stating a different dilution of disinfectant.
3.	GQ1	Many SOPs lack detail of the exact processes followed; the DI is advised to review the content of SOPs to ensure that they contain sufficient detail as stand-alone documents and that they reflect practice.
4.	GQ3	Good training systems are in place but the DI is advised to ensure that training records are all initialed and dated by the trainer.
5.	PFE5	The DI is advised to consider installing a dedicated light source above the cut-up area in the routine post mortem room. Currently a shadow is cast at the work station when in use, making it difficult for pathologists to carry out their duties.

## Concluding comments

Many areas of good practice were noted during the inspection. The mortuary has good working relationships with the Coroner's office, and benefits from having a Coroner who is proactive, holding monthly meetings with the establishment and working with them to improve standards of consent. The consent procedure is robust, with a bereavement officer being present when junior doctors take consent. Additionally, there is a good working relationship with the porters, who contact the mortuary person on call in the event of an incident.

There are a number of areas of practice that require improvement, including one major shortfall relating to PFE3 and 3 minor shortfalls relating to GQ1, GQ6 and GQ7. The HTA has given advice to the Designated Individual with respect to ensuring that SOPs reflect practices and that documentation is completed. Additionally, consistent guidance should be provided to ensure that all staff are aware of procedures to follow, particularly in respect to dealing with decontamination of high risk samples.

The HTA requires that the Designated Individual addresses the shortfalls by submitting a completed corrective and preventative action (CAPA) plan within 14 days of receipt of the final report (refer to Appendix 2 for recommended timeframes within which to complete actions). The HTA will then inform the establishment of the evidence required to demonstrate that the actions agreed in the plan have been completed.

The HTA has assessed the establishment as suitable to be licensed for the activities specified subject to corrective and preventative actions being implemented to meet the shortfalls identified during the inspection.

**Report sent to DI for factual accuracy: 12 March 2013**

**Report returned from DI: 25 march 2013**

**Final report issued: 3 April 2013**

**Completion of corrective and preventative actions (CAPA) plan**

Based on information provided, the HTA is satisfied that the establishment has completed the agreed actions in the CAPA plan and in doing so has taken sufficient action to correct all shortfalls addressed in the Inspection Report.

**Date: 11 June 2013**

## Appendix 1: HTA standards

The HTA standards applicable to this establishment are shown below; those not assessed during the inspection are shown in grey text. Individual standards which are not applicable to this establishment have been excluded.

Consent standards
<b>C1 Consent is obtained in accordance with the requirements of the Human Tissue Act 2004 (HT Act) and as set out in the code of practice</b>
<ul style="list-style-type: none"><li>• There is a documented policy which governs consent for post-mortem examination and the retention of tissue and reflects the requirements of the HT Act and the latest version of the HTA Code of Practice on consent.</li><li>• There is a documented SOP detailing the consent process (including who is able to take consent, what training they must receive, and what information must be provided to those giving consent for post-mortem examination).</li><li>• There is written information about the consent process (provided to those giving consent), which reflects the requirements of the HT Act and the latest version of the HTA Code of Practice on consent.</li></ul>
<b>C2 Information about the consent process is provided and in a variety of formats</b>
<ul style="list-style-type: none"><li>• Relatives are given an opportunity to ask questions.</li><li>• Relatives are given an opportunity to change their minds and it is made clear who should be contacted in this event.</li><li>• Information contains clear guidance on options for how tissue may be handled after the post-mortem examination (repatriated with the body, returned to the family for burial/cremation, disposed of or stored for future use).</li><li>• Where consent is sought for tissue to be retained for future use, information is provided about the potential uses in order to ensure that informed consent is obtained.</li><li>• Information on the consent process is available in different languages and formats, or there is access to interpreters/translators.</li></ul>
<b>C3 Staff involved in seeking consent receive training and support in the implications and essential requirements of taking consent</b>
<ul style="list-style-type: none"><li>• There is a training programme for taking consent for post-mortem examination and tissue retention which addresses the requirements of the HT Act and HTA code of practice on consent.</li><li>• Refresher training is available (e.g. annually).</li><li>• Attendance at consent training is documented.</li><li>• If untrained staff are involved in consent taking, they are always accompanied by a trained individual.</li></ul>

## Governance and quality system standards

### GQ1 All aspects of the establishments work are supported by ratified documented policies and procedures as part of the overall governance process

- Documented policies and SOPs cover all mortuary/laboratory procedures relevant to the licensed activity. These may include:
    - post-mortem examination, including the responsibilities of the APTs and Pathologists (e.g. evisceration) and management of high risk cases
    - record keeping
    - receipt and release of bodies, which reflect out of hours arrangements
    - lone working in the mortuary
    - transfer of bodies and tissue (including blocks and slides) to other establishments or off site
    - ensuring that tissue is handled in line with documented wishes of the relatives
    - disposal of tissue (including blocks and slides)
- (Note that individual SOPs for each activity are not required. Some SOPs will cover more than one activity.)*
- Policies and procedures are regularly reviewed (for example, every 1-3 years).
  - There is a system for recording that staff have read and understood the latest versions of these documents.
  - Deviations from documented SOPs are recorded and monitored.

### GQ2 There is a documented system of quality management and audit

- There is a quality manual which includes mortuary activities.
- Policies and SOPs are version controlled (and only the latest versions available for use).
- There is a schedule for audits to be carried out (which may include vertical and/or horizontal audits).
- Audits include compliance with documented procedures, records (for completeness) and traceability.
- Audit findings document who is responsible for follow up actions and the timeframe for completing those actions.
- Regular audits of tissue being stored at the establishment ensure that staff are fully aware what material is held and why.
- There is a complaints system in place.

### GQ3 Staff are appropriately qualified and trained in techniques relevant to their work and are continuously updating their skills

- Staff are appropriately trained/qualified or supervised.
- Staff have annual appraisals.
- Staff are given opportunities to attend training courses, either internally or externally.
- Attendance by staff at training events is recorded.

- There is a documented training programme for new mortuary staff (e.g. competency checklist).

**GQ4 There is a systematic and planned approach to the management of records**

- There is a system for managing records which includes which records must be maintained, how they are backed up, where records are kept, how long each type of record is retained and who has access to each type of record.
- There are documented SOPs for record management.

**GQ5 There are documented procedures for donor selection and exclusion, including donor criteria.**

**GQ6 A coding and records system facilitates traceability of bodies, body parts, tissues and cells, ensuring a robust audit trail**

- Bodies are tagged/labelled upon arrival at the mortuary.
- There is a system to track each body from admission to the mortuary to release for burial or cremation (e.g. mortuary register, patient file, transport records).
- Organs or tissue taken during post mortem examination are fully traceable, including blocks and slides. The traceability system ensures that the following details are recorded:
  - material sent for analysis on or off-site, including confirmation of arrival
  - receipt upon return to the laboratory or mortuary
  - number of blocks and slides made
  - repatriation with a body
  - return for burial or cremation
  - disposal or retention for future use.
- Multiple identifiers used, including at least one unique identifier (e.g. post mortem number, name, dates of birth/death, etc) to identify bodies and tissue.

**GQ7 There are systems to ensure that all adverse events, reactions and / or incidents are investigated promptly**

- Staff are trained in how to use the incident reporting system.
- Staff know how to identify incidents and near-misses which must be reported, including those that must be reported to the HTA
- The incident reporting system clearly outline responsibilities for reporting, investigating and follow up for incidents.
- The incident reporting system ensures that follow up actions are identified (i.e. corrective and preventative actions) and completed.
- Information about incidents is shared with all staff (including the reporter) to avoid repeat errors.

**GQ8 Risk assessments of the establishment's practices and processes are completed regularly and are recorded and monitored appropriately**

- All procedures related to the licensed activities (as outlined in standard GQ1) are risk assessed.
- Risk assessments include risks associated with non-compliance with HTA standards as well as health and safety risks.
- Risk assessments are reviewed regularly (along with SOPs), for example every 1-3 years.
- Risk assessments include how to mitigate the identified risks; this includes actions that need to be taken, who is responsible for each action, deadlines for completing actions and confirmation that actions have been completed.

**Premises, facilities and equipment standards**

**PFE1 The premises are fit for purpose**

- There is sufficient space for the activities to be carried out.
- Refrigerated storage units are in good working condition and well maintained.
- Surfaces are made of non-porous materials.
- The premises are in reasonable condition (structure and cleanliness of floors, walls, entranceways).
- The premises are secure (e.g. there is controlled access to bodies, tissue, equipment and records).

**PFE 2 Environmental controls are in place to avoid potential contamination**

- There is clear separation of clean, transitional and dirty zones (e.g. doors, floor markings, signs).
- There is appropriate PPE available and routinely worn by staff.
- There is adequate critical equipment and/or PPE available for high risk post mortems.
- There are documented cleaning and decontamination procedures.
- There are documented cleaning schedule and records of cleaning and decontamination.

**PFE3 There are appropriate facilities for the storage of bodies, body parts, tissues and cells, consumables and records.**

- There is sufficient capacity for storage of bodies, organs and tissues.
- Temperatures of fridges and freezers are monitored on a regular basis.
- There are documented contingency plans in place should there be a power failure, or overflow.
- Bodies are shrouded whilst in storage.
- There is separate storage for infants and babies. If not, special measures are taken for the bodies of infants and babies.

**PFE 4 Systems are in place to protect the quality and integrity of bodies, body parts, tissues and cells during transport and delivery to a destination**

- There are documented procedures for transportation of bodies and tissue anywhere outside the mortuary (e.g. lab, other establishment), including record-keeping requirements.
- There are written agreements in place with any external parties (e.g. undertaker, or courier) who transport bodies and/or tissue behalf of the establishment (laboratory or mortuary).

*(Note that coroners usually have their own agreements with external parties for transportation bodies and tissue; however, documentation for traceability purposes must still be maintained by the establishment for these cases.)*

**PFE5 Equipment is appropriate for use, maintained, quality assured, validated and where appropriate monitored**

- Items of equipment in the mortuary are in a good condition and appropriate for use:
  - fridges / Freezers
  - hydraulic trolleys
  - post mortem tables
  - hoists
  - saws (manual and/or oscillating)
  - PPE for high risk cases (e.g. respirators)
- The use of porous materials is kept to a minimum and has been risk assessed
- Maintenance/service records are kept for equipment, including fridges/freezers, trolleys, post mortem tables (if downdraught) and post mortem suite ventilation.

*(Note: These records may be held by the mortuary or centrally by the Trust, e.g. Estates Department.)*

**Disposal Standards**

**D1 There is a clear and sensitive policy for disposing of human organs and tissue**

- There is a documented Trust or mortuary/laboratory policy for the disposal of human tissue, which reflects the requirements of the HTA code of practice on disposal.
- There are documented procedures for disposal of human tissue, including blocks and slides.

**D2 The reason for disposal and the methods used are carefully documented**

- There are systems in place that ensure tissue is disposed of in accordance with the documented wishes of the deceased person's family.
- Disposal records include the date, method and reason for disposal.
- Tissue is disposed of in a timely fashion.

*(Note: this means that tissue is disposed of as soon as reasonably possible once it is no longer needed, e.g. when the coroner's or police authority ends or consented post-mortem examination is complete.)*

## Appendix 2: Classification of the level of shortfall

Where the HTA determines that a licensing standard is not met, the improvements required will be stated and the level of the shortfall will be classified as 'Critical', 'Major' or 'Minor'. Where the HTA is not presented with evidence that an establishment meets the requirements of an expected standard, it works on the premise that a lack of evidence indicates a shortfall.

The action an establishment will be required to make following the identification of a shortfall is based on the HTA's assessment of risk of harm and/or a breach of the HT Act or associated Directions.

### 1. Critical shortfall:

A shortfall which poses a significant risk to human safety and/or dignity or is a breach of the Human Tissue Act 2004 (HT Act) or associated Directions

*or*

A combination of several major shortfalls, none of which is critical on its own, but which together could constitute a critical shortfall and should be explained and reported as such.

A critical shortfall may result in one or more of the following:

- (1) A notice of proposal being issued to revoke the licence
- (2) Some or all of the licensable activity at the establishment ceasing with immediate effect until a corrective action plan is developed, agreed by the HTA and implemented.
- (3) A notice of suspension of licensable activities
- (4) Additional conditions being proposed
- (5) Directions being issued requiring specific action to be taken straightaway

### 2. Major shortfall:

A non-critical shortfall that:

- poses a risk to human safety and/or dignity, or
- indicates a failure to carry out satisfactory procedures, or
- indicates a breach of the relevant CoPs, the HT Act and other relevant professional and statutory guidelines, or
- has the potential to become a critical shortfall unless addressed

*or*

A combination of several minor shortfalls, none of which is major on its own, but which, together, could constitute a major shortfall and should be explained and reported as such.

In response to a major shortfall, an establishment is expected to implement corrective and preventative actions within 1-2 months of the issue of the final inspection report. Major shortfalls pose a higher level of risk and therefore a shorter deadline is given, compared to minor shortfalls, to ensure the level of risk is reduced in an appropriate timeframe.

### 3. Minor shortfall:

A shortfall which cannot be classified as either critical or major, but which indicates a departure from expected standards.

This category of shortfall requires the development of a corrective action plan, the results of which will usually be assessed by the HTA either by desk based or site visit.

In response to a minor shortfall, an establishment is expected to implement corrective and preventative actions within 3-4 months of the issue of the final inspection report.

### **Follow up actions**

A template corrective and preventative action plan will be sent as a separate Word document with both the draft and final inspection report. You must complete this template and return it to the HTA within 14 days of the issue of the final report.

Based on the level of the shortfall, the HTA will consider the most suitable type of follow-up of the completion of the corrective and preventative action plan. This may include a combination of

- a follow-up site-visit inspection
- a request for information that shows completion of actions
- monitoring of the action plan completion
- follow up at next desk-based or site-visit inspection.

After an assessment of your proposed action plan you will be notified of the follow-up approach the HTA will take.